

DEPARTMENT OF AGRICULTURE AND TECHNICAL
INSTRUCTION FOR IRELAND.

REPORT

OF THE

DEPARTMENTAL COMMITTEE

ON THE

IRISH BUTTER INDUSTRY.

Presented to both Houses of Parliament by Command of His Majesty.



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To His Excellency JOHN CAMPBELL, EARL OF ABERDEEN, &c., &c., LORD
LIEUTENANT-GENERAL AND GENERAL GOVERNOR OF IRELAND.

MAY IT PLEASE YOUR EXCELLENCY,

I am directed by the Vice-President to submit to Your Excellency the
Report of the Departmental Committee on the Irish Butter Industry.

I have the honour to remain,

Your Excellency's faithful Servant,

T. P. GILL,

Secretary.

DEPARTMENT OF AGRICULTURE AND
TECHNICAL INSTRUCTION FOR IRELAND,
UPPER MERRION STREET,
DUBLIN, 14th March, 1910.

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(NOTE.—The Minutes of Evidence with a Subject Index thereto, and the Appendices are published in a separate volume [Cd. 5095] 1910. The references to the evidence on the various matters mentioned in the Report will be found in the Subject Index.)

COPY

OF

MINUTE APPOINTING THE COMMITTEE.

I HEREBY nominate and appoint a Committee to inquire into and interpret the principal forms of trade description (as defined by Section 3 of the Merchandise Marks Act, 1887) at present applied, in the United Kingdom, to different grades of butter; and to suggest what additional measures, if any, it is desirable for the Department to take in the interests of the Irish butter industry, with special reference to the prevention of loss or injury to the industry from the use of false trade descriptions.

The Committee will consist of the following:—

JOHN RITCH CAMPBELL, Esq., B.Sc., Assistant Secretary in respect of Agriculture of the Department of Agriculture and Technical Instruction for Ireland (Chairman);

PROFESSOR THOMAS CARROLL, M.R.I.A., Agricultural Inspector of the Department of Agriculture and Technical Instruction for Ireland;

E. G. HAYGARTH BROWN, Esq., Superintending Inspector of the Board of Agriculture and Fisheries;

THE RIGHT HON. the EARL OF CARRICK, Inspector for Irish Produce in Great Britain of the Department of Agriculture and Technical Instruction for Ireland;

A. POOLE WILSON, Esq., Inspector of Dairying of the Department of Agriculture and Technical Instruction for Ireland.

Mrs. D. J. McGRATH is appointed Secretary to the Committee.

(Signed) T. W. RUSSELL,

Vice-President of the Department of Agriculture
and Technical Instruction for Ireland.

Dated this 23rd day of April, 1909.

REPORT.

TO THE RIGHT HON. T. W. RUSSELL, P.C.,

VICE-PRESIDENT OF THE DEPARTMENT OF AGRICULTURE AND TECHNICAL
INSTRUCTION FOR IRELAND.

SIR,

We were appointed by your Minute, bearing date 23rd April, 1909, a Committee "to inquire into and interpret the principal forms of trade description (as defined by Section 3 of the Merchandise Marks Act, 1887) at present applied, in the United Kingdom, to different grades of butter; and to suggest what additional measures, if any, it is desirable for the Department to take in the interests of the Irish butter industry, with special reference to the prevention of loss or injury to the industry from the use of false trade descriptions."

INTRODUCTION—
MEMBER OF IN-
QUIRY AND DE-
PUTY SECRETARY
OF AGRICULTURE,
—

We have now agreed to the following Report:—

PROCEEDINGS.

1. In order that our investigations into the principal forms of trade description applied to Irish butter might be comprehensive and conclusive, it was essential that all classes connected with the Irish butter industry, whether as manufacturers, blenders, wholesale merchants, or retailers, should be afforded facilities for laying before us any information or observations which they might desire to offer on the matters referred to us for report. We have, accordingly, taken effective measures to bring the subjects of our inquiry to the notice of all concerned in the industry, and to elicit their views by the following means:—

- I. The issue of circulars and letters to numerous associations, societies, and representative commercial bodies closely connected with the butter industry, and to many leading manufacturers, merchants, and other qualified persons in Great Britain as well as in Ireland;
- II. The frequent publication, as occasion required, in trade journals and newspapers, of notices setting forth the subjects of our inquiry and expressing our willingness to receive and to consider written statements or oral evidence from persons who desired to lay their views before us;
- III. The holding of public sittings for the hearing of evidence in the principal centres of the butter trade throughout the United Kingdom.

2. In response to our circulars, letters, and advertisements, we have received very great assistance from all branches of the trade. We desire to acknowledge, at the outset, our indebtedness to the many experienced and influential witnesses who willingly furnished us with authoritative evidence.

3. We held our first meeting on the 14th May, 1909, and we then directed the issue of the circular-letter and of the advertisement, copies of which will be found in the appendices to the minutes of evidence.

4. We held sittings for the hearing of evidence on seven days in Dublin, on four days in Cork, on four days in London, on three days in Manchester, on two days in Glasgow, on two days in Liverpool, and on one day in each of the following towns:—Birmingham, Bristol, Cardiff, ^{Warrington} Warrington, Leeds, and Newcastle-on-Tyne. In all, we have held 28 sittings, and we have examined 134 witnesses.

5. As mentioned in paragraph 1, it was thought desirable to give full publicity to our inquiries. Accordingly, we decided to hold our sittings for the purpose of taking evidence in public. There is no doubt that, in the special circumstances of the case, the course adopted was, on the whole, justified, but it was found that the fact that the evidence would be published in part in the daily newspapers, made it very difficult for some of the most important trade witnesses to speak as freely as they might otherwise have done.

6. The evidence from representatives of the trade in Ireland is, naturally, to a large extent that of the producers of the various classes of butter. Among those who appeared before us in Dublin and Cork we may cite the following:—Creamery proprietors and managers, owners of butter factories, merchants of Belfast, Cork, Dublin, and Limerick, farmers who make butter on their own farms, delegates of the Cork Butter Market Trustees, of the Irish Butter Trade Association, of the Irish Creamery Managers' Association, and of the Irish Creameries Protection Society. We have also received evidence on the subjects of our inquiry from the Irish Agricultural Organisation Society.

7. The evidence given in Great Britain on behalf of the trade is principally that of wholesale and retail merchants, who are buyers and sellers of butter, and it is these witnesses for the most part, who were in the best position to give us direct evidence regarding the trade descriptions applied to butter in the British markets. Among the associations, societies, and public bodies represented at our sittings in Great Britain were the Chambers of Commerce at Manchester, Liverpool, Glasgow, and Leith; Provision Trade Associations at Bristol, Birmingham, Liverpool, Leeds, Manchester, and Newcastle-on-Tyne; the Scottish Provision Trade Association; the Home and Foreign Produce Exchange; and the Federation of Grocers' Associations. The evidence of these representative bodies was supplemented by that of a very large number of merchants, who came before us in their individual capacities.

8. We have taken the opinion of members of the trade, in addition to that of Officers of the Department of Agriculture and Technical Instruction for Ireland, regarding the usefulness of extending the operations at present carried out by the Department, particulars of which are contained in appendix 2, and in the oral evidence of the Department's Inspectors and Instructors. Moreover, as the necessity of enforcing cleanliness in the conditions under which butter, or milk intended for the manufacture of butter, is produced, has been urged upon us from all sides, we have thought it desirable to obtain, from a representative of the Local Government Board for Ireland, evidence as to the functions of that Board in connection with the Public Health Acts, and other enactments, in so far as these enactments are intended to secure the observance of proper sanitary conditions in the production and marketing of butter.

9. Representatives appointed by the Agents-General in London for New South Wales, and Southern Australia, and by the High Commissioner for New Zealand, gave evidence with regard to the methods adopted in these countries for the improvement of their butter industry. Dr. A. J. Swaving, Inspector-General of Agriculture for the Netherlands, and Dr. J. J. L. van Ryn, Agricultural Commissioner to the Provincial Government of Friesland, furnished us with authoritative evidence on behalf of their Government respecting the system of butter control and other measures adopted in the Netherlands in the interests of the butter trade. Mr. Harald Faber, F.C.S., Agricultural Commissioner to the Danish Government, and Mr. F. Bagge, Agricultural Commissioner to the Swedish Government, gave us similar particulars regarding the butter industry in Denmark and Sweden respectively. We have also received, through the Colonial Office and the Foreign Office, copies of all the principal regulations and enactments relating to the dairying industry in those countries which export the largest quantities of butter to the British markets.

10. We have received useful information on the legal aspects of our inquiry from Mr. F. Safford, B.L., an eminent authority on the Merchandise Marks Acts.

11. In addition to the oral evidence, we have had submitted to us many letters and other written statements on all subjects of our inquiry. The principal of these have been incorporated in substance in the minutes of evidence, or are printed in the appendices thereto, and all of them have received our careful consideration.

INTRODUCTION—
METHODS OF IN-
QUIRY AND REVI-
SION OF REPORT.

DIVISION OF SUBJECT.

Part I.—Trade Descriptions.

12. We have attached very great importance to the first part of our terms of reference, viz.: that dealing with the interpretation of the principal forms of trade description at present applied in the United Kingdom to butter; and we have accordingly, devoted special attention to that part of our inquiry. Taking into account the number of merchants and manufacturers who have given evidence as to the custom of the trade, either directly or through associations, the experience and standing of the witnesses who came before us, and the fact that full opportunity was given for every interest to be represented, we are satisfied that the views of all sections of the trade have been fully heard, and we have accordingly the greatest confidence in presenting you with our findings as set out in Part I. of this Report.

Part II.—Measures involving action by the Department of Agriculture and Technical Instruction for Ireland.

13. Our terms of reference directed us to have special regard to the prevention of loss or injury from the use of false trade descriptions, but, at the same time, left it open to us to take into our consideration other measures whereby the Department might foster the interests of the Irish butter industry. We have availed ourselves of the latitude thus allowed in obtaining from those actually engaged in the trade, suggestions and criticisms with reference to every branch of action whereby the Department might develop, as well as protect, the industry. As the result of our inquiry, we have recommended certain measures involving action by the Department, and these are set forth in Part II. of this Report.

Part III.—Position of Irish Butter on the British Markets.

14. We have admitted a considerable amount of evidence of a general nature for two reasons: Firstly, we considered that information as to the general condition and requirements of the Irish butter trade was necessary in order that we might be in a position to make useful suggestions for the guidance of the Department of Agriculture and Technical Instruction for Ireland; and, secondly, we were convinced that any measures which the Department might take for the prevention of loss or injury to the industry from the use of false trade descriptions would be largely nullified if, at the same time, efforts were not made to remove existing obstacles, altogether disconnected with questions of trade descriptions, which at present stand in the way of Irish butter obtaining a foremost position on the markets. We have reason to believe that, incidentally, our sittings in Great Britain have, on the one hand, dissipated some unfounded prejudices, which, for one reason or another, existed in certain districts, and on the other hand, have brought out prominently some matters to which the attention of all concerned in the production of butter in Ireland should at once be directed. The information we received as to the position of Irish butter on the British markets is of such a striking character that we have devoted to it a separate Part of this Report (Part III.)

PART I.
TRADE DESCRIPTIONS.Names used for
describing Irish
butter.

PART I.—TRADE DESCRIPTIONS.

15. Prior to the introduction of creameries, many descriptions applied to butter from Ireland, other than the description "Irish Butter," appear to have been names derived from localities or packages. Creamery proprietors have always claimed that the system of manufacture as carried on by them is superior to the older methods, and they have endeavoured to include in the trade descriptions of their butter words to indicate that it was made at a creamery. The superiority of this class of butter has now been well established in the markets, not only in the case of butter from Ireland, but also in the case of butter exported from other countries. In fact, almost all foreign and colonial countries from which large supplies are received, now export no other class of butter in any appreciable quantities. If, in Ireland, as has happened in other countries, the produce of the creameries had entirely superseded other classes of butter sent to the British markets, no doubt the general description, "Irish Butter," would have been found adequate by the trade, and this description would doubtless have obtained the meaning which now appertains to the term, "Irish Creamery Butter." In Ireland, however, the creamery system has not so completely replaced home dairying. Contemporaneously with the increase in the number of creameries, butter factories (at which butter purchased from farmers is blended prior to being placed on the market) also increased, and, at the same time, a development took place in the system of butter-making at the farmers' home dairies owing to the introduction of hand-separators, while the churning of whole milk or hand-skimmed cream continued to be practised by a large number of farmers. This development of different methods of production led to the classification of Irish butter according to the premises in which it originated, *i.e.*, the creamery, the butter factory, and the home dairy. In these circumstances, the older forms of fancy names, derived from package and locality, have been gradually superseded or supplemented by names indicating the systems of production. This process, however, has not been carried out on any regular lines. The selection of names, the rejection of unnecessary or ambiguous terms, and the decision as to what class of butter is designated by any particular name, have not formed the subject of any general agreement on the part of the members of the trade, and have not been subjected to any supervision by trade associations or other public bodies, but have been left to chance and to the varying judgment of individual traders and manufacturers. We are, accordingly, not surprised to find that the number of names introduced has been altogether excessive, and that abuses have occurred in their application.

In the course of our inquiry, there were brought to our notice over forty names at present applied to Irish butter, exclusive of registered names and brands, and of words solely indicative of quality.

Names derived
from localities
and from
packages.

16. Among the large number of names referred to, only two instances appear in which names derived from localities have acquired any definite significance beyond indicating the district in which the butter to which they are applied was made. The terms "Cork Firsts," "Cork Seconds," etc., are best known as indicating that the butter has been graded in the Cork market under the supervision of the market trustees. The other term is "Kiel." It originally indicated that the butter had been shipped from Kiel in casks, but is now often applied to any butter packed in 112-lb. casks. Among the names which have been derived from packages, or method of packing, we find the expressions "firkins," "kitts," "butts," "cloth lumps," and "lumps," which are always understood to apply to butter made at the farmstead. Terms of this kind appear to have originated at a time when all butter made in Ireland was manufactured by the churning of hand-skimmed cream or whole milk. However, since the introduction of the creamery system, the quantity of butter sold under these names has diminished, and is now considered to be an unimportant factor in the butter trade in Great Britain. That they are still well known is due to their former importance, and not to their being now in much use.

17. The principal descriptions at present applied to Irish butter are names which simply indicate the class of premises in which the butter is manufactured. In Ireland butter is manufactured in three kinds of premises, namely, "creameries," "dairies," and "butter factories," and there are thus three classes of butter, "creamery butter," "dairy butter," and "factory butter." We find, as the result of our inquiry, that of the large number of designations brought to our notice these are the three well-established names under which all Irish butter is classified by the existing custom and usage of the trade.

PART I.
TRADE DESCRIPTIONS.

The three well-established names.

CREAMERY BUTTER.

18. The term "creamery butter" according to the custom of the trade means unblended butter made from cream separated by centrifugal force from the commingled milk supplies of a number of cowkeepers, in premises adapted and utilised for the manufacture of butter in commercial quantities.

Definition.

19. We are satisfied that the word "creameries" was used more than thirty years ago, but only as a fancy name, and then by one or two persons at the most. The Merchandise Marks Act was passed in the year 1887, about which time the movement for the erection of what are now known as creameries began to spread. No claim was put forward by any witness to the right to use the word "creamery" either as a fancy name or applicable to a particular class of butter, on the ground that it was lawfully and generally applied as a trade description before the passing of the Act of 1887. Has the word "creamery" now become, according to the custom of the trade, a trade description, as indicating a mode of manufacture? This question we can undoubtedly answer in the affirmative, as unanimous testimony was offered by traders that the word has been commonly brought into use contemporaneously with the growth of the number of establishments known as creameries. This conclusion is also borne out by an examination of trade papers of the last twenty years.

"Creamery" a trade description.

20. The Department of Agriculture and Technical Instruction for Ireland, prior to the appointment of this Committee, had formulated the following definition for the purposes of their scheme for the improvement of creameries:—

Department's definition of a creamery.

The term "Creamery" shall mean any premises adapted and utilised for the manufacture of butter from cream separated by centrifugal force from the commingled milk supplies of a number of cowkeepers, provided that, on every day on which milk or cream is treated at the premises, the quantity so dealt with is sufficient to make at least fifty-six pounds of butter, and that the premises are not utilised for any purpose which would necessitate their registration under the Sale of Food and Drugs Act, 1875 to 1897.

We considered it important to ascertain how far this definition is in agreement with the practice of the trade. The evidence established the fact that in the minds of both manufacturers and merchants the essential conception of a creamery is a place which is adapted and utilised for the purpose of manufacturing butter in commercial quantities on the system specified in the definition. Moreover, the considerable number of trade witnesses to whom we submitted the definition agreed in accepting its terms as representing this general idea of a creamery.

Some modifications, which do not affect its essential meaning, have been suggested. The principal of these has reference to the minimum daily output of butter required. Some witnesses considered that the milk supply of a minimum number of cows or herds should be substituted for the production per diem of at least 56 lbs. of butter, while others suggested various alternatives as regards the quantity of butter to be fixed as the minimum. At the same time, the great majority of the witnesses were satisfied with the definition as it now stands, and it was admitted that the fixing of 56 lbs. of butter as the minimum was not open to the objection that an arbitrary standard was laid down, inasmuch as a 56 lb. box is a well recognised unit package dealt with in the wholesale trade.

From the evidence laid before us as to existing practices, we are, however, of opinion that the final clause of the definition, which provides that

TABLE I.
TRADE DESCRIPTIONS.
1923.

premises used as a creamery "shall not be utilised for any purposes which would necessitate their registration under the Sale of Food and Drugs Act, 1875 to 1907," prescribes a restriction on the use of creamery premises which has not been generally recognised by trade custom and usage. At the same time, trade witnesses considered some restriction of this nature might be required in order to safeguard Irish butter from misdescription, and creamery proprietors themselves urged upon us the great desirability in the interests of the industry of a regulation of this kind. Having regard to circumstances, to which we shall subsequently refer, we are convinced of the necessity for some such provision. Moreover, the restriction prescribed by the Department's definition is one with which creameries, with a comparatively few exceptions, at present comply, and to which all creameries, in our opinion, can conform without any undue limitation upon trade, and with much benefit to the industry. We shall, therefore, consider, in a subsequent paragraph, specific suggestions for giving effect to this portion of the definition. We are satisfied that the terms of the Department's definition express as accurately as is possible the type of premises which the custom of the trade associates with the name "creamery" as applied to places in which butter is manufactured in Ireland, and we feel no hesitation in stating that the opinion of the trade is that the butter made at such premises is creamery butter. Having carefully considered all the evidence, we are of opinion that the meaning of the trade description "creamery butter" is as follows:—

Unblended milk made from cream separated by centrifugal force from the commingled milk supplies of a number of cowkeepers, in premises adapted and utilised for the manufacture of butter in commercial quantities.

Misapplication of term "creamery butter."

21. While there was unanimity on the part of all who came before us that "creamery butter" is the proper description for the butter made at a creamery, it is not surprising that, in the absence hitherto of a definition, the association of the term with the highest class of butter, and its consequent value as an advertisement, should have led to its being used outside its proper meaning. A view sometimes expressed, but opposed to the evidence of the great majority of the trade witnesses, is that the term "creamery butter" might be applied to any butter of superior quality whatever may be its origin. A sufficient proof that the word has not been dissociated in practice from the system of manufacture is that even those trade witnesses who considered that the term might be used for other classes of butter, admitted that if they were asked for "creamery butter" they would not supply butter which had not been made at a creamery unless the recipient had been made aware of the particular meaning which they attached to the words in question. Another claim to an extended use of the term is due to the close connection between the introduction of the system of centrifugal separation and the establishment of creameries. It is argued that all butter made from centrifugally separated cream, whether at creameries or not, is entitled to be designated "creamery butter." This contention is dealt with in paragraph 24. A further claim to which exception must be taken is one sometimes made by creamery proprietors themselves, viz., that blends of two or more creamery butters or a reworked creamery butter may be legitimately described as creamery butter. This claim, which we also find to be contrary to the custom of the trade, is referred to in paragraph 27.

Use of prefix "centrifugal"

22. Creamery owners usually label their butter as "creamery," with or without a prefix. It is rarely described by any fancy name alone. The term "creamery" has acquired a commercial value as indicating the best Irish butter, and, accordingly, there is no inducement to substitute any other name. The words "centrifugal," and "guaranteed centrifugal" are frequently prefixed to the term "creamery butter." This practice has arisen owing to other butters being offered for sale under names which implied that they were creamery butter. We agree with the opinion repeatedly expressed by witnesses that if the term "creamery" could not be imitated, the prefix "centrifugal" would be unnecessary and would cease to be employed. The interpretation of the term "creamery butter" which we have arrived at is clear, admits of no misunderstanding as to its proper application, and is

based upon the custom of the trade. We think, therefore, creamery proprietors and all concerned in the sale of "creamery butter" would be well advised in their own interest to use this term and this alone, and to eschew all unnecessary variations or prefixes, as these have in the past conduced to confusion and consequent injury to the industry.

Page 1.
Trade Descrip-
tion.

DAIRY BUTTER.

23. The term "dairy butter" as understood in the trade means butter made at the farmer's homestead, whether from whole milk, hand-skimmed cream, or cream extracted from the milk by means of a separator. It is divided into two main classes. One consists of butter made by churning hand-skimmed cream or whole milk, and this division is sometimes sub-divided according to the methods of curing and packing. We have already referred to the names used for these subsidiary divisions, *e.g.*, *firkins*, *butts*, *kitts*, and *lumps*. The other class of dairy butter is of recent introduction, and is made from cream extracted from the milk by the use of a centrifugal separator. This butter has no well-established name, apart from the general term, "dairy butter." It was variously described by witnesses as "separator dairy butter," "hand-separator butter," "farmers' separator butter," or merely "separator butter."

Definition.

24. Some butter merchants in Ireland argued that the word "creamery" could be legitimately used in the description of the latter class of dairy butter, and we actually found the word so used in a few cases, *e.g.*, "farmers' creamery butter" and "separator creamery butter." The claim to the right to use the word "creamery" in the description of dairy butter was made principally by those merchants in Ireland who buy, direct from farmers, butter made with the use of the hand-separator—some of them even contending that blends of this class of dairy butter are entitled to be described as "creamery butter." Those who made this claim contended that butter made by the use of a hand-separator at the farmer's own premises and butter made at a creamery were manufactured on the same system. A few traders in Great Britain for a similar reason considered that if the same care, appliances, and scientific methods were in use at the farm as at the creamery, there was no logical reason why the name "creamery" should be withheld from unblended butter made at the farmer's private dairy. But, the use of the name "creamery" for dairy butter produced from centrifugally separated cream has not been established as a trade custom. Such is the view of owners of creameries, nor do the manufacturers of dairy butter of this class claim that they have established a right to the use of the word "creamery" for their produce. A number of those who make dairy butter of the best quality have obtained a sufficient reputation for their private brands, and others would be quite content, provided their butter was not classified with that made from hand-skimmed cream or whole milk. Our inquiry in the markets of Great Britain showed that butter merchants, with rare exceptions, strongly objected to the application to such butter of the term "creamery," however that term may be qualified. They point to its irregularity, which they ascribe to the small lots in which it is made, to the times and temperatures at which it is churned—conditions very different from those which obtain in creameries. If the same conditions were found in the farm dairy as in the creamery, and if this class of butter were made daily at each farm in sufficiently large commercial quantities, we agree that there would be no logical reason why it should not be called "creamery." But in actual practice we see no possibility of such being the case. The number of cows owned by the individual farmer is usually not sufficient to produce the quantity of milk which would be required for the daily churning and production of butter in sufficient quantities to enable consignments to be placed on the market with the uniformity in quality and supply required by the wholesale trade. We are impressed with the importance of this fact as the constant complaint against Irish butter in comparison with foreign and colonial butters is its irregularity. Wholesale merchants in Great Britain require for the purposes of their trade, quantity, continuity of supply, and regularity in quality, and these are requirements to which the system of home dairying is least conducive, but which the processes of manu-

Misuse of term
"creamery" in
descriptions of
dairy butter.

Part I.
Trade Descriptions
Bill.

facture as carried out at creameries and butter factories are actually framed to satisfy. With these handicaps, butter from the farmer's home dairy cannot be expected to compete with creamery butter in the wholesale trade, and we find it is a negligible quantity in all the principal markets of Great Britain. As a matter of fact, it would appear that most of the dairy butter which is ultimately sold in the wholesale markets of Great Britain has originally been purchased from the farmers in Ireland by owners of butter factories, who grade and blend it so as to secure uniformity, although no doubt some of the best of it is recond unblended. Having regard to the requirements of the trade, we do not think that any better means could be adopted of marketing dairy butter of the average quality, and on this basis we shall consider at a later stage how this class of butter might be improved with benefit to owners of butter factories as well as to the farmers themselves.

Dairy separator
butter.

25. At the same time, we are aware that there are farmers, who, owing to their special skill and other advantages, produce, with the use of the separator, excellent butter which they are able to dispose of at a high price by establishing a connection with retailers or private customers. Having regard to the possibilities of the development of this method of manufacture, we think that the industry might fairly claim the monopoly of a distinctive title for such butter when sold direct from the farm without re-packing, re-working or re-blending. The name by which it appears to be now best known is "hand-separator butter." As, however, many farmers use power-driven separators, and as this practice may go on increasing, owing to the introduction of small motors, it would appear better to adopt the term, "dairy separator butter."

FACTORY BUTTER.

Definition.

26. The term "factory butter" as understood in the trade means butter which has been blended, reworked, or subjected to any other treatment but not so as to cease to be butter. This term is a well-established description in all parts of the United Kingdom, and we found no confusion as to its meaning. A butter factory is defined by Section 1 of the Butter and Margarine Act, 1907, as "any premises on which by way of trade butter is blended, reworked, or subjected to any other treatment, but not so as to cease to be butter," and the evidence is conclusive that all butter so treated is known in the trade as "factory butter."

"Factory" the
proper descrip-
tion of all blended
or reworked
butter.

27. As we have already indicated, the bulk of dairy butter is not put directly on the market, but is collected from the makers and taken to a factory where it is blended, sometimes with the addition of a proportion of creamery butter. Some manufacturers in Ireland claimed that the blending together of two or more lots of butter made on the same system did not necessitate an alteration in the trade description of the butter. Thus we found blenders, who buy butter from farmers, claiming that butters made by the use of a hand-separator, if blended together without any admixture of other classes of butter, might still be described by whatever name was applied to them before they were so blended. Some owners of creameries argued on similar lines that two creamery butters blended together might still be legitimately described as creamery butter. The fact that the blending or reworking of inferior butters actually in some cases renders more uniform their quality has been relied on as a strong argument in favour of their contention by most of the witnesses who made this claim. This argument, however, would appear to us to have weight only if the names which they seek to retain, instead of being indicative as they are of the system of production, were purely terms indicative of quality. The reworking which blending necessitates has always the effect of altering the original texture of the butter, and it is this change in texture which is regarded by the trade in Great Britain as the distinguishing characteristic of factory butter. So clear was the custom in this matter in Great Britain that witness after witness affirmed that the blending of two creamery butters together, or even the reworking of one, was sufficient to necessitate the classification of it as

"factory," and that any butter reworked or blended could be recognised by an examination of its texture. There is no doubt, however, that there is a large section of the butter trade, consisting principally of persons dealing as wholesale merchants in a small way, or as retailers, whose experience is too limited to give them sufficient expert knowledge to enable them always to tell the difference when they are offered "factory" as "creamery" butter. We think these traders are very likely to be misled by the misdescription of blended butters as "creamery" or "separator" butter.

PART I.
TABLE DESCRIBING
TYPES.

28. Although, no doubt, some excellent blended butter is produced, the trade in Great Britain generally regards factory butter as a second or third class article, while Irish creamery butter is looked upon as the best Irish butter. This is shown by the trade reports and quotations. We regret to find that in the circumstances many attempts are made, by the use of misleading terms and specious arguments, to sell "factory" as "creamery" butter. In Ireland, as we have seen, creamery owners universally take care to include the word "creamery" in the description of their produce. The practices of the owners of factories in describing their butter is, on the other hand, very variable. Some label it "factory." Others use a fancy name which gives no indication of the method of manufacture. Unfortunately, such names as "creams," "separator creams," "separator creamery," are sometimes used, which, whatever may be the object, are certainly liable to deceive those classes of purchasers already referred to who are not sufficiently expert to distinguish factory butter by inspection. As a result of the sale of factory butter under names simulating "creamery butter," there is no doubt that the reputation of Irish butter as a whole is most detrimentally affected. Butter sold as "Irish Creamery" is regarded with suspicion, and owing to the competition of so-called creamery butters, can only be disposed of at a reduced price.

Use of misleading names for factory butter.

We hope that not only in the interests of the industry, but also of honest trading, the use for factory butter of descriptive terms suggesting in any way "creamery butter," will be discontinued. The results of our inquiry should, we believe, be a strong deterrent against such abuses in future, inasmuch as the offender can no longer claim that the term "creamery butter" is a doubtful or ambiguous expression, and so evade the provisions of the Merchandise Marks Acts. Many witnesses, however, regarded the matter as so serious that they recommended special legislation to compel the makers of factory butter to label their produce with the word "factory." Strong exception was, however, taken to this suggestion by many owners of butter factories. They stated that owing to the great range of quality between the best and the worst factory butters, it would be a distinct hardship to be compelled to label the best with the same trade name as the worst. Others urged that the name "factory" conveys an objectionable meaning, especially to operatives accustomed to factory life in cities. We do not attach much importance to this objection, since the word "factory" is only used as between the shipper, the wholesale merchant, and the retailer, and never on the counter where it would be seen by the consumer. It is true, however, that the branding of "factory" on the boxes might interfere with the business of some retailers who exhibit butter in boxes in the windows of their shops. Taking all the circumstances into account, we incline to the view that, provided our proposals in Part II. for safeguarding the use of the term "creamery" are adopted, it will not be necessary to compel blenders to label their butter "factory," and we think that they might be allowed to use fancy names, provided that these are not in any way misleading.

29. We have now completed to the best of our ability the first of the duties entrusted to us, but we do not feel justified in concluding this Part of our Report without adverting to the extraordinary number of subsidiary terms which purport to describe the method of manufacture of the butter to which they are applied. It is only in the Irish butter trade that such a variety of names are used. Their existence appears to be due to

Excessive number of subsidiary names for Irish butter.

PART I.
TRADE DESCRIPTIONS.
WOTCS.

the circumstances already referred to, in which the Irish butter industry was developed. They now serve no useful purpose, nor do they appear to be wanted by any section of the trade. On the contrary, at the present time, the great majority of these terms are ill-defined, misleading and very injurious to the industry. Most of them are of purely local application, are never used in the principal butter markets, and are but little known even in the districts in which they have originated. They have, in many cases, arisen from the predilection of the individual manufacturer or trader for some new term to distinguish his produce, or, in some cases, as we have seen, to mislead the purchaser as to the true origin of the butter. We have found more than twenty different terms which would suggest that the butter to which they are applied was made at a creamery, and it was admitted that some of these were used as descriptions for butter made on the home dairying or factory systems. The attempts of the owners of creameries to find terms which will satisfy their customers as to the process of manufacture of their butter, on the one hand, and, on the other hand, the attempts of the makers of "factory" or other butters to sell their produce under a description suggesting that it is of "creamery" manufacture, would appear to be accountable for this excessive number of variations. Many of these terms have different meanings. As an example, we may refer to the term "creams." The main use of this term is clearly as a contraction of the word "creamery." By some buyers, however, the name is incorrectly applied to other classes of butter. We are convinced of the absence of any necessity for the extraordinary number of descriptions which have been introduced in connection with the trade in Irish butter, and of the injury to the reputation of all classes of Irish butter from the confusion and suspicion caused by their use, even when they are not intentionally employed to mislead.

So great is the injury done to the industry by the use of confusing and misleading terms, that we have no hesitation in recommending the proper authorities to seek special powers to enable them to prevent effectively the harmful results of abuses of this kind by measures which we will explain in the following Part.

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SUGGESTED
MEASURES.

PART II.—SUGGESTED MEASURES INVOLVING ACTION BY THE DEPARTMENT OF AGRICULTURE AND TECHNICAL INSTRUCTION FOR IRELAND.

30. Having interpreted the trade descriptions, we now proceed to consider, as directed in your Minute, "what additional measures, if any, it is desirable for the Department to take in the interests of the Irish butter industry, with special reference to the prevention of loss or injury to the industry from the use of false trade descriptions."

Representative
produce in
creameries.

31. As we have seen in the previous Part, a great deal of the misdescription referred to has been caused by the desire of vendors of dairy and factory butter to use descriptive terms simulating the term "creamery." While we are satisfied that in this respect creamery proprietors have a grievance, we must point out that in many instances the owners of creameries themselves are responsible for some forms of misdescription. It was given in evidence that it is customary for creamery proprietors in the winter months to purchase foreign, colonial, or other butters and to re-sell them without giving any indication that they are not of Irish origin. The purchaser is, in fact, left to assume that the butter is the genuine production of the creamery from which it comes. Again, another use for which creamery premises are sometimes employed, is the blending and reworking of butters—in other words, while the premises are ostensibly a creamery they are utilised at the same time as a butter factory. These practices are, for obvious reasons, open to serious

objections. It has been urged that their prohibition would involve harassing restrictions which would react injuriously on the industry. We have given full weight to the considerations urged in extenuation of these practices, namely, that during the winter months, in order to conserve the creamery's customers, it is necessary that foreign butters, or other purchased butters, should be procured, and that it is desirable that the use of the premises for blending butters should be permissible when, owing to the reduction in the milk supply, the creamery cannot be profitably utilised for the production of creamery butter. The remedy clearly lies in the development of winter dairying, the importance of which to the Irish butter industry is demonstrated in Part III. For the present, it will suffice to point out that so long as the owners of creameries can supply their customers in winter with foreign and colonial butters, and do so at a profit, there can be no great incentive to winter dairying.

The utilisation of the same premises as a creamery and a butter factory is not only objectionable as affording facilities for fraudulent practices and as causing suspicion among merchants as to the true character of butter from Irish creameries; it also militates against that stability and clearness which are so desirable in the classification of Irish butter, and tends to undermine eventually the existing classification and create fresh confusion. We have pointed out the want of confidence that now exists with regard to Irish creamery butter. We feel sure that it will be intensified unless these practices are stopped at the very outset. We are aware that, so far, creamery proprietors have only in a few cases registered their premises for the purpose of enabling them to make factory butter. The present, therefore, is an opportune time for dealing with these developments, which, if they are allowed to pass through usage to establish themselves, cannot afterwards be interfered with without considerable dislocation in trade. The butter factory is clearly defined by the Butter and Margarine Act, and is subjected to supervision for the prevention of fraudulent blending. The more we examine into the remedies for the confusion in the classification of Irish butter, the more clearly it appears that it is necessary that there should be an Authority empowered to define and to exercise supervision over the most important type of premises in which Irish butter is at present made. The conditions which have given rise to the misuse of the term "creamery" by manufacturers, blenders of butter, and butter merchants, the circumstances which have resulted in the introduction of so many unnecessary and misleading variations of the term "creamery butter," and the reprehensible practices carried on at creameries, to which we have referred, may all be removed by such supervision. It would be unfortunate if, while attention is concentrated upon removing these resulting evils, action is not at the same time taken to stop the mischief at its source. We are aware that the Department of Agriculture and Technical Instruction for Ireland have power under Section 2 (3) of the Butter and Margarine Act, 1907, to authorise specially one of their Officers to enter and inspect any unregistered premises on which they have reason to believe that any process of blending or reworking is carried on, and we think this power might be exercised with advantage. What is required, however, is that a proper system of supervising and regulating the operations of creameries should be established. The Department, whose existing functions under the Agriculture and Technical Instruction (Ireland) Act, 1899, bring them into close connection with the butter industry, and who are already charged with the duties of supervising Irish butter factories under the Butter and Margarine Act, 1907, and of instituting proceedings for evasions of the Merchandise Marks Act, 1887, under the Merchandise Marks (Ireland) Act, 1909, are, in our opinion the Authority by whom the supervision of Irish creameries can be most efficaciously exercised.

32. For this purpose, legislation is, in our opinion, necessary. Such legislation, to be effective, must, in addition to making the definition of a creamery authoritative, provide effective means for ensuring that the terms of the definition are complied with. The measures which we recommend for this purpose would subject creameries to regulations somewhat similar to the statutory requirements with which owners of butter and margarine factories have at present to comply in regard to the registration and inspection of their premises. The Department of Agriculture and Technical Instruction for

Regulations for
supervision of
creameries to
prevent mis-
description.

Ireland should be empowered to make regulations of this nature, to which all creamery proprietors should be legally obliged to conform, and these regulations should embody the following conditions:—

1. No premises shall be used for the production of creamery butter in Ireland unless and until they are registered as a creamery with the Department by the person bona fide carrying on the business;
2. No premises shall be registered as a creamery by the Department unless and until the Department are satisfied that the butter produced in the premises is creamery butter;
3. No premises shall be registered as a creamery which require to be registered under the Sale of Food and Drugs Acts, 1875 to 1907;
4. Premises registered as a creamery shall be open at all reasonable times to inspection by the Officers of the Department, with the object of enabling the Department to satisfy themselves that the premises are not utilised for any purposes prohibited by law;
5. The trade description "creamery" shall not be applied to any butter consigned from any premises used for the production of butter in Ireland unless and until such premises have been registered as a creamery by the Department;
6. No butter shall be consigned from a creamery in any package or wrapper which is not marked (in such manner as the Department may approve) with the words "Irish Creamery Butter" and with a special registered mark or number to be allotted by the Department, which number or mark shall vary with each creamery.

N.B.—The registration and inspection above referred to shall in no way compel any creamery proprietors to conform to any of the Department's schemes for encouraging improvement in the management of creameries; the participation in such schemes to be purely voluntary.

We believe that these proposals would be acceptable to creamery owners. They have asked that their produce should be protected. They have claimed for it a high reputation which we have found is, on the whole, justified by the evidence we have received in Great Britain as to its quality. We consider that their claim for protection has been made good, but in order to secure their aims it is necessary that they should submit to such regulations as we propose.

Measures for
securing cleanli-
ness in produc-
tion of milk,
cream and butter.

33. In our opinion, there are very strong reasons based on other grounds in favour of requiring the inspection and registration of all creameries. We were impressed with the evidence given by persons conversant with the regulations relating to the butter industry in colonial and foreign countries, with which Ireland has to compete on the British markets. The premises in which butter is made on the creamery system in these countries are usually subjected to inspection or official supervision of some kind. While the quality of some Irish creamery butter is superior to that of the produce of other countries, it is stated that Irish creamery butter as a whole exhibits a far greater range of quality between the highest and the lowest than is found in butter made on the same system in the countries in question. We do not believe that this is altogether due to defective management or defective equipment. Nothing influences butter more than the purity of the milk supply, and we were informed by creamery managers as well as by the instructors of the Department of Agriculture and Technical Instruction that one of the greatest defects in the Irish creamery system is the use of dirty milk in the manufacture of butter. A supply of dirty tainted milk from one farm alone is sufficient to reduce the value of the whole of one day's output of a creamery. In some countries, not only is the condition of the milk supply of the creamery subject to inspection, but also the farmer's premises where the milk is produced. So much importance is attached to the cleanliness of the milk that a system has now been established in some foreign countries whereby the scale of payments for milk supplied to creameries will be regulated by the standard of cleanliness as well as by the usual one of percentage of

butter-fat. In fact, in some of those countries which are largely engaged in supplying the British markets with butter, attention is now being concentrated almost altogether upon perfecting the condition of the milk supply. In Ireland there are no special inducements framed for encouraging a high standard of cleanliness in the milk sent to creameries. In the circumstances, carelessness as to the condition of the milk is general among farmers who supply creameries, with the result that milk is often received of such a character that no creamery manager, however skilful, can make from it a uniform butter of good quality. Moreover, the milk suppliers are often the employers of the manager, who is not in a position to take exception to the supplies of farmers who are members of the Society owning the creamery, and who may even be members of his committee of management. It appears, also, that in several districts where proprietary creameries exist side by side with co-operative creameries, or where there are more than one co-operative creamery drawing supplies from the same district, there is considerable competition for supplies of milk, and what the manager of one creamery refuses will be accepted by the manager of another in the hope of acquiring a new patron. In the circumstances, those engaged in the butter trade in Ireland and in Great Britain laid stress upon the necessity of visits of qualified inspectors to the creameries and to the premises of the milk suppliers for the purpose of enforcing the observance of proper conditions in regard to the milk supply from which butter is produced.

Many witnesses urged that any person who supplied milk to a creamery in such a condition that it was likely to taint the produce of the creamery should be liable to prosecution, and considered that the Department of Agriculture and Technical Instruction for Ireland would be the proper body to institute prosecutions of this kind. We are, however, of opinion that a satisfactory general standard of cleanliness in the milk supply can best be secured by a general agreement among creamery proprietors to refuse to accept dirty milk. At the same time, we think that a better effect than could be obtained by an occasional prosecution would probably result from firm and consistent enforcement of regulations similar to those made under the Dairies, Cowsheds, and Milkshops Orders. We are not prepared to recommend that any person should be compelled to produce clean milk in his own interests, but where the producer of milk damages the property of others by sending to a creamery milk which will contaminate the milk of a large number of his neighbours, such action is an offence, and should be subject to penalties. We accordingly suggest that the Department should seek power, in so far as may be necessary in the general interests of the industry, to regulate all the conditions under which milk is produced and subsequently treated for the manufacture of cream or butter.

We feel also that much will be done to improve the milk supply by a stringent and extended enforcement of the sanitary regulations recently promulgated in the interests of the public health. We are, however, informed that the premises of farmers who manufacture butter for sale are not subject to the regulations contained in the Dairies, Cowsheds, and Milkshops (Ireland) Order, 1908, issued by the Local Government Board for Ireland under the Contagious Diseases (Animals) Acts, 1878 and 1886, although these regulations apply to the premises of farmers who sell milk for manufacture into butter at creameries. We think it desirable that the farmer's premises, at which the butter which ultimately reaches the butter factory, is produced, should be subjected to similar regulations as apply to the premises at which milk is produced for sale to the creamery.

34. We have now shown the necessity for legislation, giving the Department of Agriculture and Technical Instruction for Ireland power to make regulations: (1) for the protection of the reputation of Irish butter from misdescription, and (2) for enforcing proper conditions in the production of butter and of milk and cream in cases where the general interests of the industry are affected. The legislation required for the purpose cannot be regarded as drastic. It would involve no principle not already sanctioned by existing legislation. It would extend to creameries, on the one hand, a similar system of registration and inspection as is at present compulsory in the case of butter factories, and to the producers of dairy butter (who are the suppliers to butter

Remedy as to the
nature of the
proposed
legislation.

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factories) on the other, the same sanitary regulations as are at present compulsory on producers of milk who are the suppliers to creameries. The resulting benefits to the industry will be great, and will do much to enhance the reputation of all classes of Irish butter. We, therefore, do not hesitate to advise the Department to press for the necessary legislation, nor do we anticipate that any serious difficulty will be experienced in obtaining it, having regard to the unanimity with which manufacturers, merchants, and all concerned in the industry urged the desirability and advantage of the inspection and the supervision of the conditions under which Irish butter is produced.

Grading.

35. Another proposal which would involve legislation has received prominence at our inquiry. The suggestion is that all Irish butter consigned for sale to Great Britain otherwise than in small quantities by parcels post or by passenger train, should be graded at the ports of shipment in Ireland, or at the ports of arrival in Great Britain by Officers of the Department of Agriculture and Technical Instruction for Ireland. This proposal had to be considered from two points of view, viz.—(1) its intrinsic merits, and (2) its practicability. Having regard to the importance of the subject, we considered it right to elicit as fully as possible the opinions of merchants and manufacturers from both these points of view. We need not here refer in detail to the arguments adduced in favour of and in opposition to the introduction of a universal system of grading, as a means of promoting the interests of the Irish butter industry. These arguments are dealt with at considerable length in the minutes of evidence. In general, the evidence leads us to conclude that the value of a system of grading as a method of regulating the price of butter is dubious, but that its advantage from the educational aspect is indisputable. There is no doubt, however, that the application of the system to Ireland could not be effected without seriously interfering with the conditions under which the Irish butter trade is at present conducted. While more than one trade witness, whose experience and position gave weight to their opinion, spoke emphatically in favour of grading Irish butter, all of them admitted that very great obstacles had to be met with from the practical point of view. Whether the interference with trade to which we have referred would be compensated for by educational advantages is a matter which could only be finally determined by actual experience. In view, however, of the strong opposition expressed to the grading of Irish butter, we do not feel warranted in recommending the Department at the present juncture to seek legislation and to incur the expenditure which would be necessary in order to put the matter to a decisive test. It will be time enough to consider the advisability of such action when the Department have evidence that grading is necessary to the interests of the Irish butter industry or commends itself to any large number of manufacturers. We think that in the present circumstances the Department might secure for butter-makers the educational advantages referred to by an extension of their existing Scheme in the manner which we suggest in the following paragraphs.

Importance of
educational
scheme.

36. Passing from those measures which require legislation, we now proceed to consider other means whereby the Department of Agriculture and Technical Instruction for Ireland might advance the interests of the industry. The recommendations we have made, if carried out efficiently, will at least secure compliance with the minimum requirements to which all those engaged in the industry should be legally obliged to conform. We are fully aware, however, that while certain legislative measures are required to safeguard the industry, no amount of legislation can make Irish butter command the first place in the British markets. This can only be done through one agency, which must rank far above all others in importance in enhancing the reputation and the relative price of Irish butter, and that is the education (technical and commercial) of all those directly or indirectly engaged in the industry. In the appendices we have included a memorandum* by the Department's Inspector of Dairying, explaining the educational

* Appendix 2.

schemes which the Department have at present in operation for encouraging improvement in the dairying industry. During the inquiry, many references were made to these schemes, and from the evidence, as well as from an examination of the schemes themselves, we are satisfied that, on the whole, they are well adapted for the purpose for which they are intended.

It will be convenient here to give a summary of the means at present adopted by the Department for promoting the dairying industry. The production of milk in winter is encouraged by a scheme for promoting the extension of tillage which would yield feeding stuffs for dairying stock. At the same time experiments are being carried on to ascertain the cost of producing milk in winter months. Another scheme is concerned with the improvement of cattle, and in this connection action is being taken to establish an Irish dairy herd. Provision is also made for affording instruction to farmers by specially trained Officers in all matters relating to the treatment of cattle. A further scheme is devoted to instruction in the manufacture of dairy butter, with resulting advantages, not only to the farmers themselves, but also to the owners of butter factories. The general curriculum of the Department's agricultural stations throughout the country, as well as of the winter agricultural classes and of the schools of rural domestic economy, includes the subject of dairying. Special courses of training are also provided for dairymaids at the Munster Institute, Cork, and the Ulster Dairy School, Cookstown, and for creamery managers at the Department's Agricultural Station, Ballyhaise. An examination in subjects relating to creamery management is held by the Department annually, and certificates are granted to successful candidates, who are also entitled to receive special certificates when they have satisfied the Department as to their practical capability as creamery managers. In addition, visits of Instructors in Dairying are made to creameries, and surprise butter competitions are held at which the produce of creameries is tested. Experiments and investigations are conducted as occasion arises into all matters calling for special inquiry in connection with the production and marketing of butter.

These measures appear to us to form a comprehensive system of instruction, covering every branch of the industry. It is hardly necessary to point out that the advantages to be derived from them will depend largely upon the extent to which they are availed of by all those concerned in the various operations to which they relate. It is distinctly encouraging to find that a very large proportion of the more enterprising farmers and manufacturers attached great value to them, and have availed themselves of the facilities thus afforded for improvement. Until, however, these schemes are availed of by all manufacturers, and until inspection is made compulsory, Irish butter, as a whole, must continue to suffer in reputation and take an inferior place in the British markets. It is possible by legislation to compel a certain amount of care in the treatment and manufacture of butter as a product intended for human consumption. Beyond this, however, all improvement must be based on education, supported by voluntary efforts. In the latter respect a considerable development is required in Ireland. In other countries a great deal of educational work has been initiated and administered by local associations, which in many cases comprise the most influential local residents in the various districts in which they are established. The evidence of Dr. Swaving and of Dr. van Ryn ought to be read by those who wish to acquaint themselves with what local associations do and have done in the Netherlands. The evidence of Mr. Faber and of Mr. Bagge also bears witness to the utility of such associations in Denmark and Sweden. It has been a matter of great surprise to us to find how small a share the State in Holland, in Denmark, and in Sweden has to take upon itself in the actual administration of schemes similar to those which the Department of Agriculture and Technical Instruction for Ireland has been obliged, not only to initiate, but to administer, with little or no assistance from associations of this kind. As a means of stimulating effort in every portion of the country, of promoting improvement in methods of manufacture, and of enforcing and safeguarding the regulations of the various schemes, local associations, if constituted on a proper basis, contribute the most effective form of assistance that can be devised for furthering the welfare of the industry. We refer to this matter in Part III. We allude to it here inasmuch as the absence of such associations in Ireland is a

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serious obstacle to the adoption of a proposal, favoured by a large number of manufacturers and merchants, for establishing a special brand to be used for butter in the case of approved creameries. This proposal is sufficiently important to justify us in referring to it at some length.

Governmental
Brand for Irish
Creamery Butter.

37. We have already made one recommendation involving the branding of butter, viz. :—that all butter consigned from Irish creameries shall be labelled or branded with the words "Irish Creamery Butter," and with a special mark indicating the creamery from which it is consigned. Another proposal for the marking of Irish butter was frequently discussed in the course of our inquiry. At present, the only mark of recognition given to a creamery which attains a satisfactory standard of merit is its inclusion in the list of approved creameries published by the Department of Agriculture and Technical Instruction for Ireland. It was urged that if the use of a special brand were granted by the Department to those creameries which reached the Department's standard in respect of methods and equipment, the result would be that butter so branded would be recognised in time in the markets as the highest class of Irish creamery butter, and would, accordingly, command the highest price. On the merits of this proposal the evidence was, however, somewhat conflicting. As in the case of grading, to which we have already referred, many merchants were of opinion that the adoption of this arrangement would have no influence on prices. On the other hand, we cannot ignore the fact that the Authorities in several foreign countries which supply the British markets have considered it an advantage to establish special Governmental Brands, to be used by manufacturers of butter who comply with prescribed conditions; and that the New Zealand and Australian Governments have thought it desirable to assign to exported butter official grade marks, which serve a somewhat similar object. The action of the Swedish Government was frequently cited. A brand for Swedish butter is issued by that Government, which, while it indicates the country of origin, is also, to some extent, a guarantee of quality, inasmuch as it may be used only by those creamery proprietors whose butter attains a sufficiently high standard at the surprise competitions or tests held in Sweden. Similarly, the action of the Dutch Government was quoted, in which case creamery proprietors conforming to certain conditions are supplied by the Government with special labels, which are affixed to each package of butter. The primary object of these labels is to afford a guarantee that the butter has been made under such conditions as to ensure its purity. While, doubtless, the ultimate factor in determining the price of any particular class of butter is its quality, it cannot be denied that these well-established Governmental Brands have promoted the sale of the butter to which they are applied by inspiring confidence among merchants as to the conditions under which it is made. They appear to act as passports, admitting the butter to lucrative markets which it could not otherwise reach at all or only at a price below its intrinsic merits.

In these circumstances, and having regard to the fact that the application of a similar system to Irish butter is supported by a large body of opinion, both among manufacturers and merchants, we think the Department might usefully prepare a detailed scheme for the issue of a Governmental Brand for Irish butter of the best quality. It will not be necessary for us to do more than indicate the general conditions on which the use of the brand might be permitted, leaving it to the Department to draw up such regulations as they may think necessary for controlling and safeguarding its use. It is, of course, important that these regulations should be framed on a sound basis, and strictly enforced, if the brand is in time to establish itself to the advantage of both manufacturers and buyers. It is noteworthy that in those countries in which brands of this kind are used, associations, which are not State Departments in the ordinary sense, take the greatest share in upholding the credit of the brand. We think that before promulgating a scheme of this kind, the Department would be well advised to ascertain what assistance would be forthcoming in promoting the scheme and in preventing abuses, which, unless discountenanced by all concerned, are likely to discredit, if not destroy, the value of the brand. The precautions in this respect adopted in Holland are particularly interesting. By means of local associations of a representative character in each district, all undesirable persons are vigilantly excluded from any participation in the scheme under which the Governmental labels are issued. Unless the mass-

facturers in Ireland are prepared in a like manner to take an active interest in promoting the scheme now proposed, and in safeguarding the prestige of the brand, we think that the Department would be warranted in abandoning the proposal.

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Assuming that manufacturers are prepared to take their share in the scheme, we think that the first action of the Department should be to register a design for the brand under the Trade Marks Acts, which design should be the sole property of the Department. At the present stage we think it would be sufficient to establish one brand of this kind, and that this should be a brand for Irish creamery butter. As we have seen in Part I. owners of butter factories are averse to using any brand on their butter which would indicate that it was "factory butter." Moreover, no desire was expressed by owners of butter factories or by makers of dairy butter for any Governmental Brand. The makers of the best dairy butter as well as proprietors of butter factories have usually well-known private marks or brands which have an established reputation among their customers.

With regard to the requirements which would form the basis for deciding whether a creamery should, or should not, be entitled to the use of the Governmental Brand, two alternatives were suggested. One opinion was to the effect that the use of the brand might be allowed, provided that the cleanliness of the milk supply and of the creamery itself was maintained at the standard required for the production of first-class butter, and that the management of the creamery was otherwise satisfactory. The other view was that these requirements alone would not sufficiently safeguard the brand from being applied to inferior butter, and that some further provision would have to be made to prevent the loss of reputation which would thus be entailed. The grading of Irish butter, already referred to, is one system which might be utilised for this purpose, but, for the reasons given in paragraph 35, we do not consider that the establishment of such a system is at present feasible. Another method of testing the produce of Irish creameries already exists in the surprise butter competitions, which at present form an important feature of the Department's creamery scheme, and witnesses generally agreed that these competitions, if developed, could be utilised with advantage in connection with the issue of the Governmental Brand to creameries. We think it is a matter of great importance that every reasonable precaution should be taken against the use of the brand on butter of inferior quality. We see little difficulty in developing the system of surprise butter competitions in such a manner as will meet the requirements of the case. All that is necessary is that the competitions should be held at shorter intervals, that those creameries whose produce is found to be defective should be subjected to more frequent tests, and that the use of the brand should not be permissible if the quality of the butter, as ascertained by these tests, was found to be unsatisfactory. The existing system of visits of Inspectors to creameries, especially to those which do not regularly obtain high positions at the competitions, might, at the same time, be developed and with more benefit to the trade generally. Adequate means would thereby be provided for securing that the use of the brand is not granted in the case of any creamery which fails to conform to a satisfactory standard of cleanliness and general good management. It was alleged by some witnesses that special "makes" of butter are sent to the competitions, but no one produced evidence in support. Means should, however, be adopted to prevent any possibility of further allegations of a like nature. A brand of this kind would not be a guarantee of the quality of individual consignments from a creamery, but it would be an assurance that the creamery was approved by the Department, not only for its cleanliness and good management, but also for the average good quality of its produce, so far as these can be judged by inspections. We cannot but think that such a brand will, in course of time, become a valuable commercial asset, provided, as we have said, it is properly safeguarded from misuse.

38. Moreover, we consider that the development of surprise butter competitions, and of visits of Inspectors to creameries, will go far to provide the educational advantages which would accrue from a system of grading butter like that adopted in New Zealand. These educational advantages consist in this: The grader, who has an expert knowledge of the manufacture of butter, when examining each package of butter, makes a note of any defects observed

Surprise Butter
Competitions.

in it, and these notes, as well as the grade marks, are communicated without delay to the manufacturer. In this way the manufacturer is shown, in the most convincing manner, the particular points in which improvement is required. He is made aware of deficiencies of which he would otherwise remain ignorant, and is impelled to seek means of remedying them. The instruction required for this purpose is usually obtainable from instructors in Dairying, who are now to be found in almost every country in which the butter industry is of importance. A similar arrangement is already carried out in connection with the surprise butter competitions of the Department of Agriculture and Technical Instruction for Ireland. These competitions afford the further advantage from the educational point of view, that the butter can be retained in store a sufficient time to allow latent defects to develop. We attach the greatest importance to this method of educating the manufacturers of Irish butter, and, apart altogether from the utility of these competitions in connection with the issue of the proposed brand, we think that their number should be largely increased. We also think it very desirable that managers of creameries entered for these competitions should be permitted, as has been done, to attend subsequent to the judging for the purpose of hearing the views of the judges on the butter generally and of examining the exhibits for themselves. On all sides the opinion was expressed that the competitions were of the greatest possible advantage. The system whereby the Department selects judges from among butter merchants in Great Britain appears to be a wise one from the point of view of marketing, since, as the evidence showed, it had incidentally the effect of greatly enhancing the reputation of Irish butter among British merchants, and had led some of the judges to do business in Irish butter who had formerly not considered that it possessed the merits which it does. With the proposed extension of the competitions, it is suggested that the Department's creamery instructors, as well as creamery managers, should be associated with the judging. It was pointed out, however, that not only should these competitions be held more frequently in the case of creameries often producing butter of low quality, but that in future they should not be described as "competitions"—a name which inclines to give rise to the idea that the gaining of prizes which should be discontinued is the main object in view, and not, as should be the case, a general improvement in the character of the daily output.

Visits of experts
in butter-making
to British
merchants.

39. Another means of securing the educational advantages to which we have referred, is well worthy of the consideration of the Department of Agriculture and Technical Instruction for Ireland. Valuable information might be obtained regarding not only the quality of Irish butter generally, but also the defects in the produce of particular creameries, by means of visits of experts in butter-making to the principal wholesale stores in the large centres of consumption in Great Britain. These officials, in addition to learning of defects in Irish butter, would be qualified to inquire into the causes of them, and subsequently to explain to the manufacturers the means by which they might be remedied. We thought it right to ascertain whether the necessary facilities for the inspection of butter for this purpose would be afforded by the merchants in Great Britain, and in most cases our inquiries showed that merchants would be prepared to afford all information and assistance required provided care were taken to prevent overlapping and too frequent visits.

Exhibits of Irish
butter at Produce
Shows.

40. Reference was also made, in the course of the evidence, to a means already adopted by the Department of Agriculture and Technical Instruction for promoting the sale of Irish butter in Great Britain. Irish butter has been exhibited by the Department from time to time at a number of Produce Exhibitions at the principal centres of consumption. There appears to be no doubt that such exhibitions have great value in advertising Irish butter as well as other agricultural products, in addition to affording opportunities for educating merchants in Great Britain in regard to the merits of Irish butter.

Instruction and
improvement in
business methods
required.

41. The instruction of butter manufacturers in business methods—a most important subject—is apt to be lost sight of while attention is concentrated upon securing efficiency in methods of manufacture. The necessity of giving more attention to commercial questions, and, in particular, to improved methods of marketing, was urged on us by many trade witnesses. For instance, it was

stated that creamery owners, in many cases, did not send out their butter in a sufficiently inviting form as regards packing and finish, and that butter is frequently held over at the creamery in the hope of an advancing market, to be then sold without any intimation that it is not freshly made. It was also asserted that in certain cases creamery managers have not always maintained a high code of business rectitude in their dealings with merchants, who complained that sometimes they did not obtain deliveries of their purchases, owing to advantage being taken by the manager of a later and more remunerative offer. On the other hand, some creamery managers sell butter "on consignment," without making any effort to find a profitable market for it. Unfortunately, the committees of co-operative creameries are, at times, extremely lax in the discharge of their duties. They do not always take a sufficiently keen interest in such important matters as costs of production, cleanliness of the milk supply, prices realised for their produce, and other conditions upon which the success or failure of the creamery depends. Furthermore, they do not always appear to realise the amount of good they can do by entering into the work of their staff, by encouraging a high degree of cleanliness in the premises and surroundings, and by rewarding efficiency in the working of their creamery. We are of opinion that proprietors of creameries should encourage cleanliness in the milk supply, either by means of bonuses to their suppliers or by the establishment of local milk-grading associations. At present creamery managers when they make absolutely necessary proposals for enforcing cleanliness and for providing the machinery required for the economical production of butter, have not always the support of the proprietors. Creamery owners, in many cases, fail also to realise the wisdom of making the position of a creamery manager attractive by paying fully qualified and energetic men salaries commensurate with their efficiency, by providing suitable housing accommodation for them, and by having that close acquaintance with the actual working of their creamery which will enable them to rate the services of the manager at their proper value and to exert fitting supervision over the affairs of the creamery. The formation of local associations of creamery proprietors and others, which we have already alluded to, would, no doubt, have good effects in this direction also, by bringing creamery owners into close touch with each other and by making them acquainted with the various questions affecting the industry generally. In the meantime, we think it would be useful if the Inspectors in Dairying of the Department of Agriculture and Technical Instruction for Ireland attended as often as practicable meetings of committees, for the purpose of affording information and advice with regard to matters of this kind, and if the Department took steps to collect, arrange, and furnish to creamery proprietors statistics which would enable them to check the value of the work done at their creamery.

PAGE 11.
SUGGESTED
MEASURES.

42. As regards the technical education of creamery managers, we are of opinion that the courses of instruction in subjects relating to creamery management, provided at the Royal College of Science and at other centres, have served a useful purpose. The more recent system of providing winter courses in technology, followed by apprenticeships in creameries, appears, in particular, to be well framed to meet the requirements of the industry in future. Among the present managers there are some well qualified to assist in raising the standard of Irish butter and the reputation of Irish creameries to a position superior to that of any other country, but the Irish butter industry can never attain its possibilities until the number of such men is increased. We recommend the Department of Agriculture and Technical Instruction, in considering the various means by which they can promote the Irish butter industry, to attach the greatest importance to the technical and commercial training of those who are, or will be, entrusted with the management of Irish creameries.

Courses of instruction in subjects relating to creamery management.

43. Improvement by instruction and education must not, however, be limited to those engaged in the manufacture of creamery butter. The farmer who is responsible for the milk supply needs instruction, not only in the rearing and feeding of cattle, but more particularly in the precautions necessary for the production of milk in a clean and satisfactory condition for the manufacture of butter. Much of the irregularity in quality complained of in the case of Irish butter is largely due to the defective condition of the milk

Improvement in dairy butter-making.

Part II.
SUGGESTED
MEASURES.

which, for reasons we have already indicated, cannot always be controlled by the manager of the creamery to which it is supplied. We think it would be well for the Agricultural Instructors of the Department of Agriculture and Technical Instruction to give special attention to this subject. It is in this direction also that owners of butter factories can be benefited by the educational efforts of the Department. We do not think that there is any great need or demand for instruction among the owners or managers of butter factories themselves, but there is no doubt that improvement in the production of butter at the farmer's premises would do much to assist owners of butter factories to raise the average quality of factory butter. We have already made recommendations as to regulations concerning the conditions under which milk intended to be mixed with milk supplied by other farmers should be produced. We think the same principle applies to butter made and sold to be blended at a factory with the butter of the other farmers; and we are of opinion that the conditions under which such butter is made should be subject to the regulations. If these measures are supplemented by the additional facilities afforded under the Department's scheme for instruction in dairy butter making, we think that all that is practicable at the present stage will have been done to assist the owners of butter factories by educational methods. The Department's scheme under which loans are made on easy terms to farmers for the purchase of hand-separators is also conducive to the production of dairy butter of the best quality. If these schemes are fully availed of by the farmers the trade in dairy butter and in factory butter will be greatly benefited.

SUMMARY OF
MEASURES TO BE
TAKEN BY THE
DEPARTMENT.

44. It will be observed that in suggesting additional measures involving action by the Department of Agriculture and Technical Instruction for Ireland, we have found it convenient to deal with the subject under three main heads, viz. :—(1) Measures requiring legislation, which in our opinion are essential in order to enable the Department to protect Irish creamery butter from misdescription whether by manufacturers or merchants. (2) Measures requiring legislation whereby the Department will be enabled to regulate the conditions under which the production of milk, butter, and other dairy products is carried on, and (3) Measures, principally of an educational character, whereby the Department (assisted by the voluntary efforts of those engaged in the industry) might promote improvement in Irish butter. It may be useful to set forth, in a summarised form, the developments which our recommendations in this Part of our Report will, if adopted, necessitate in the present operations of the Department :—

- (1.) To seek powers (a) to establish and to keep a register of all creameries in Ireland, (b) to have these creameries inspected for the purpose of safeguarding the use of the term "creamery" and of ensuring that the premises are not utilised for prohibited purposes, and (c) to make regulations for ensuring that all butter consigned from an Irish creamery shall be marked in such manner as the Department may approve with the words "Irish Creamery Butter" and with a special number or mark to be allotted by the Department to the creamery.
- (2.) To seek powers so far as may be necessary in the general interests of the industry, to regulate the conditions under which butter, or milk for the manufacture of cream or butter, is produced.
- (3.) To formulate regulations, and otherwise to arrange for the administration of a scheme for the use of a Governmental Brand for butter made at approved creameries; in the event of the necessary support being forthcoming from manufacturers, in connection with the proposal.
- (4.) To encourage all connected with the industry to avail themselves of the educational schemes referred to in this Part of our Report; inasmuch as the education of all engaged in the industry must form the principal means of improving Irish butter.

45. In the meantime we recommend that the Department of Agriculture and Technical Instruction for Ireland take special steps, by bringing our findings before all those engaged in the industry, to secure the co-operation of the principal trade associations and other bodies, as well as of individual members of the trade, in stamping out the abuses to which we have referred in Part I. In the course of our inquiry, many prominent and representative witnesses have expressed the greatest dissatisfaction that so many unnecessary terms have been applied to Irish butter, and their satisfaction that an effort is now being made to arrest the growing confusion. We believe that the recommendations as set forth in this Part of our Report will, if carried out, achieve this purpose. They are based upon the evidence of those actually engaged in the industry. We, accordingly, are confident that they will receive the commendation and active support of all concerned.

PART II.
SUGGESTED
MEASURES.

PART III.—POSITION OF IRISH BUTTER ON THE BRITISH MARKETS.

46. In money value, the export of butter from Ireland in the year 1908, as shown by the statistics of exports of agricultural produce, was exceeded only by the export of cattle, which is valued at £10,935,197. In that year the total value of the butter imported into the United Kingdom from the colonies and foreign countries was £24,080,912, and in the same year the value of butter exported from Ireland amounted to £4,028,023, or 14.32 per cent. of the total butter trade of the United Kingdom. It is noteworthy that in recent years Germany has almost ceased to export butter and is importing large quantities. The same tendency to reduction is observable in the exports of butter from the United States. The export to the United Kingdom of butter from Canada has fallen away very much, owing to the increase in population in that colony and to the fact that the manufacture of cheese is replacing, to some extent, the production of butter. On the other hand, an enormous expansion has taken place in the imports of butter from the Australasian colonies and from Siberia.

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POSITION OF IRISH
BUTTER ON THE
BRITISH MARKETS.

Value and
quantity of Irish
butter on the
markets.

The total quantity of all classes of butter exported from Ireland during the five years 1904-1908, according to statistics compiled by the Department of Agriculture and Technical Instruction for Ireland, averaged 808,735 cwt. yearly, a figure which does not include quantities sent in parcels by post or by passenger train. During the same period the total amount of butter imported into the United Kingdom from colonial and foreign countries averaged 4,229,421 cwt. annually. Of the latter quantity Denmark contributed 1,738,131 cwt. The next largest amount contributed by one country was 553,834 cwt. from Russia. Other countries which furnished large supplies are: Australia, 501,868 cwt.; France, 342,964 cwt.; New Zealand, 288,496 cwt.; Netherlands, 214,075 cwt.; Sweden, 208,894 cwt. As almost all the butter exported from Ireland is consigned to Great Britain it will be seen that next to Denmark, Ireland is the largest supplier to the British markets.

While imports from Denmark are now fairly uniform in quantity throughout the year, the total output from Ireland is practically restricted to six months. In addition, the trade in Irish butter is largely concentrated at particular centres of distribution in Great Britain, thus making it, at certain times and places, a factor of very great consequence. Although Irish butter largely displaces other butters in the summer as an article of consumption, the influx of Irish butter has not the result of reducing the total imports of foreign and colonial butters for the summer months below the figures for the winter months. It would appear that a certain quantity of the butter received in the markets in summer is cold-stored to meet the shortage in supplies of Irish butter during the winter season. From the foregoing it will be apparent

PART III.
POSITION OF IRISH
BUTTER AS THE
EXPORT MANUFACTURE.

that during the period of the year in which Irish butter is dealt with in large quantities, its relative volume as compared with that of other butters is much greater than might be inferred from the annual statistics of imports and exports. In the markets in which it is mainly dealt with the volume of trade in Irish butter during the summer months must be very large.*

Present distribution
of the
trade in Irish
butter.

47. In the course of our inquiries among the wholesale merchants in Great Britain, we found that the trade in Irish butter was largest in the great centres of consumption in the west, for instance, Wales, Lancashire, and the west of Scotland. Although Irish butter reaches markets situated on the east coast, the trade in Irish butters at these markets is not very extensive. These circumstances may be accounted for by the difference in transit facilities. In the matter of transit the markets in the west of Great Britain are most favourably situated for the Irish trade, while the situation of those on the eastern coast is more advantageous to the trade in Scandinavian and other continental butters. Much, however, might be done to promote the sale of Irish butter in the eastern districts of Great Britain, and we are confident that such efforts would have the sympathy and support of merchants generally in these markets. If through rates for butter between railway stations in Ireland and the principal butter markets in Great Britain were universal; if refrigerator chambers for butter were more generally provided by railway and shipping companies, and were fully availed of by manufacturers; if the consignor in every case took the precaution of ascertaining the exact period occupied in transit, and notifying the consignee of the route by which the butter is forwarded with a view to securing delivery in time for the market; and if the carrying companies gave better facilities for early delivery by lessening avoidable causes of delay in transit; we think that the barrier which transit difficulties present to the establishment of an extensive trade in Irish butter in the east of Great Britain might be removed.

Relative import-
ance of the three
classes of Irish
butter.

48. We regret that we have been unable to ascertain the amount of each of the three classes of Irish butter, viz., creamery, factory, and dairy, sent annually to Great Britain. On this point manufacturers in Ireland were disagreed. It was stated by creamery proprietors that creamery butter forms considerably more than half of the total output from Ireland. On the other hand, it was stated at our sittings in Cork that the greater proportion consists of factory butter and dairy butter. On prosecuting our investigations in Great Britain, we found that everywhere the evidence given before us conveyed the impression that creamery butter constituted the greatest bulk of Irish butter. At a public inquiry, it must, however, be borne in mind that the tendency on the part of the witnesses who deal in two or more classes of butter would be to lay most stress upon their trade in creamery butter, which was spoken of everywhere in Great Britain as a superior grade to factory and dairy butter. Moreover, the extensive application to factory butter of names suggesting creamery, which has undoubtedly been going on, may have influenced some witnesses to refer as little as possible to the trade in that class of butter.

The amount of unblended dairy butter which finds its way from Ireland into the wholesale markets of Great Britain is almost negligible. A lucrative trade in dairy butter is carried on between the farmer and the retailer or consumer without the intervention of the wholesale merchant. With improved methods of manufacture this retail trade may, and should be developed. It is, indeed, a distinct loss to the country that the trade in high-class dairy butter

* The following figures show the imports of Danish butter into the United Kingdom for each of the six months, May to October, 1908, and the exports of butter from Ireland for the same period:—

| Butter consigned to the U.K. from Denmark. | | | | Butter Exports from Ireland (exclusive of quantities sent in parcels by post or by passenger train). | | | |
|--|----|-----|---------|--|----|-----|---------|
| 1908 | | | cwt. | 1908 | | | cwt. |
| May | .. | ... | 149,221 | May | .. | ... | 67,194 |
| June | .. | ... | 188,332 | June | .. | ... | 115,009 |
| July | .. | ... | 154,487 | July | .. | ... | 129,652 |
| Aug. | .. | ... | 184,864 | Aug. | .. | ... | 107,820 |
| Sept. | .. | ... | 179,320 | Sept. | .. | ... | 97,775 |
| Oct. | .. | ... | 222,426 | Oct. | .. | ... | 72,984 |

and especially the "roll" trade, is at present so small and that such an overwhelming proportion of this butter can only be disposed of when converted into factory butter.

Whatever may be the exact relative proportion of creamery butter and factory butter, there is one conclusion which our inquiries clearly established, namely, that Irish manufacturers who wish to cater for the best wholesale trade must depend solely upon creamery butter for this purpose. In this connection we may again draw attention to the fact that foreign and colonial butters, with which Irish has to compete, are almost entirely the product of creameries. So completely has the export of butter to the British markets from several continental countries been restricted to this one class, that "Danish butter," "Swedish butter," "Dutch butter," and others are invariably accepted by British merchants as butter made on the creamery system. Ireland would appear to be almost the only country which at present exports to the wholesale markets of Great Britain any large quantities of butter which is not the product of creameries.

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BRITISH MARKET.

49. It is a matter of considerable satisfaction to find that the wholesale merchants in Great Britain are of the opinion that some of the butter produced in Ireland is superior in quality to butter from any other country which supplies the British markets. If, therefore—and we see no valid reason why such a result should not be attained—its average quality can be levelled up to the standard which is already reached by the most careful and skilled manufacturers, Irish butter should establish its superiority against all competitors.

Unfortunately, at present, Irish butter suffers greatly owing to irregularity in quality and in supply.

Quality of Irish
Butter.

50. Dealing first with the want of uniformity in quality, we find it stated that butter from the same manufacturer varies considerably in quality from week to week, and that when butter has to be obtained from more than one manufacturer, its quality, including flavour, texture and colour is often so very variable as to create a strong prejudice against it. Merchants were unanimous in stating that uniformity in the appearance, taste, and colour of the butter received week after week has become an absolutely essential requirement of the trade. Some went so far as to state that by judicious management the taste of the public can be brought to accept, and even to appreciate, inferior butter, provided its quality is fairly uniform, but that butter, however intrinsically good, which varies in quality from week to week can never be made to satisfy the public demand. This want of uniformity is the outstanding fault in Irish butter as an article of merchandise; nevertheless it is not, at least in the case of creamery butter, an inherent defect which cannot be removed. On the contrary, creamery butter can be, and is in fact, conspicuous for regularity in quality. In proof of this we have only to refer to the uniformity in flavour, texture, and colour of the butter from colonial and foreign countries, which is, perhaps, the most noticeable feature in which they contrast with Irish butter. This uniformity is emphasised by the methods of marketing. Traders contract for the "makes" of Scandinavian and Australasian creameries for periods varying from six months to a year, thus ensuring regular supplies of certain "makes." These supplies are distributed amongst their customers, who always receive the same "make" unless they have lodged complaints of quality, when they may be supplied with butter from another creamery, and they are then continuously supplied with that "make" if satisfactory. As both Scandinavian and Australasian packages have the names or brands of the creamery on the package, or on the butter, buyers have a guarantee that they are receiving the same "make," and although there may be variations in quality, such variations unless they are pronounced do not lead to complaints. The fact that the buyer is assured that he is receiving the same "make" which he knows to be generally regular in quality, no doubt influences him when inspecting the butter. On the other hand, although a few merchants state that they have received regular consignments from certain Irish creameries with satisfactory results, the general practice is to buy week by week without contracting. This leads to frequent changes in the source of supplies. The merchant's customer

Irregularity in
quality.

is not able to satisfy himself that he is getting the same "make" of butter each time, and thus examines the butters more critically and is more prone to make complaints of lack of uniformity. If the produce of individual Irish creameries is supplied under their own brand, and the butter is good, the brand becomes generally known and is asked for or contracted for regularly. When the merchant's brand is the only one used, though it may be placed on butters of equal quality, the butters may differ in character owing to having come from different districts, and thus give the impression of lack of uniformity. The mark of identification which is suggested in Part II. will, to some extent, remedy this, but in addition the makers of Irish creamery butter should each register a brand and put it on the whole of their "make" when that is of the best quality.

One of the circumstances which give Irish butter a reputation for irregularity in quality, viz., the existence of three different classes, is sufficiently dealt with in Parts I. and II. Generally speaking, creamery butter has attained such an undisputed position on the markets as the best butter from almost every country that a demand for other classes of butter in the highest class wholesale trade is practically non-existent. Consequently, creamery butter, and it alone, must be relied on to raise the reputation of Irish butter to the first position which under an improved system of manufacture, it can and should occupy in the markets of Great Britain. At the same time, so long as factory butter and dairy butter are shipped from Ireland, it is desirable that both these classes should also be maintained at as high a degree of merit as possible. And if, as we hope will be the case in the future, these three classes are no longer confused one with the other by the use of misleading names, the effect on the reputation of Irish butter, resulting from the existence on the market of three different grades, will be minimised.

As we have said, in all the large centres of distribution in Great Britain, Irish creamery butter was admitted to be the best of Irish butter, and the best of this butter was considered to be the finest butter in the world. That such should be the case might be expected. In soil and climate, Ireland greatly surpasses every country in its suitability for the production of all dairy commodities. Until the comparatively recent development of improved methods in the manufacture and marketing of butter in various foreign and colonial countries, Irish butter occupied the paramount place in the markets of Great Britain, and had no serious rivals. But Ireland did not maintain this superiority by keeping pace with other countries in the improvement in methods of manufacture and marketing which, partly as a result of scientific developments and partly as a result of more diffused instruction in all that makes for the production of high-class butter, have in recent years practically revolutionised the whole system of manufacture. No doubt a large number of manufacturers in Ireland have adopted the modern methods associated with the creamery system. It is only fair to say that of these a great number compare favourably in all respects with the best butter-makers in other countries. Taken as a whole, however, Irish creamery proprietors have not yet reached the degree of proficiency of which we believe they are capable, more especially in regard to such vitally important matters as cleanliness of the milk supply and facility in adapting themselves to the particular requirements of the markets. There are a very considerable number of creamery proprietors who have not yet availed themselves of the opportunities for improving their business now afforded by the Department of Agriculture and Technical Instruction for Ireland; there are a large number of creamery managers who have never had a satisfactory technical or commercial training; and, there are a large number of milk suppliers and of producers of dairy butter who are not sufficiently alive to the importance of care and cleanliness in the handling of milk. All these causes are largely accountable for the irregularity to which we have referred. We have in Part II. urged the importance of educational and other measures to deal with these deficiencies. In the following paragraphs we will confine ourselves to pointing out some of the directions in which improvement in production and marketing may be expected.

51. The fine flavour and aroma of the grass butter, consigned freshly-made from Ireland, is an asset which gives it an advantage over all other butters in the markets. The present insipid or unpronounced flavour of Scandinavian

butters is attributed to the necessity which has arisen for the use of artificial feeding stuffs for the dairy cattle and to the pasteurisation of the milk from which these butters are made. We do not think that the general adoption of pasteurisation would deprive Irish butter of its superiority in flavour. On the other hand, pasteurisation would tend to produce a greater uniformity in the flavour of Irish creamery butter as a whole. Moreover, the development of winter dairying, which is so desirable, would necessarily involve the adoption of pasteurisation in order to eliminate from the milk the "fodder flavours," which otherwise would be transmitted to the butter from the roots and other feeding stuffs used during the period while the cows are stall-fed. We, therefore, strongly advise the universal adoption of pasteurisation in all Irish creameries. We may mention that the Local Government Board for Ireland, in the interests of the public health, also recommend pasteurisation.

PLATE III.
POSITION OF IRISH
BUTTER IN THE
BRISTOL MARKET.

52. Another respect in which improvement and greater uniformity in Irish butter are required is its texture. We are aware that the texture of a great deal of Irish creamery butter is sufficiently firm and close to suit the most fastidious taste. In a great many cases, however, the texture is much too soft or open to meet the requirements of the trade. The nature of the pastures in Ireland, and the fact that the trade is a summer one, contribute to this defect.

Texture and
percentage of
moisture.

Much genuine misconception, injurious to the Irish butter industry, has arisen in Great Britain regarding the amount of moisture contained in Irish butter. The open texture to which we have referred allows some of the moisture to collect in drops which are not retained by the butter, but flow from it when it stands for some time on the counter, and more especially when it is cut. This has given rise to the opinion that Irish butter contains a large percentage of water. The assumption is no doubt a natural one, but it is misleading. A butter presenting a perfectly dry and firm texture very often may be found to contain a larger percentage of water than a butter showing loose moisture. The objectionable appearance which a soft and watery texture presents is in itself a serious disadvantage from the commercial point of view. It is stated that in addition the wholesale merchant or the retailer suffers pecuniary loss from reduction in weight occasioned by water draining from Irish butter. This, however, is a matter which we think has been somewhat exaggerated. When we questioned merchants as to the frequency of complaints of loss of weight, we generally found that the number of such cases was small. As will be observed from a memorandum* on this subject, prepared by the Department's Inspector of Dairying, and from the evidence of Mr. G. Brownlee, B.Sc., the analyses of a large number of samples of Irish creamery butter have shown that the percentage of water is not higher than that of Scandinavian and other butters, and that in very few instances, indeed, is the water content higher than 15 per cent. Another circumstance largely contributes to creating a false impression among merchants in Great Britain regarding the water content of Irish butter. There is still a trade in Irish firkin butter containing a high percentage of water, which is sold, with, of course, the necessary disclosure. Although the amount of such butter is insignificant, the fact that it is Irish, and that it is on the market, has given rise to the opinion which we found prevalent in a number of districts, that all Irish butter has a larger percentage of moisture than Scandinavian and other butters. As an instance, we may mention the fact that a merchant engaged very largely in the trade asserted at our sittings that he had always understood that all Irish butters were exempted from the 16 per cent. limit. Again one reason which may account for some complaints in regard to the keeping qualities of Irish butter is this defect in texture. At the same time, Irish butter can be placed on the market so quickly after its manufacture that the importance of securing long-keeping properties may not be realised to the same extent as in the case of foreign and colonial produce.

Having regard to the foregoing circumstances, we think that a strenuous effort ought to be made by all concerned in the manufacture of Irish butter to remedy so serious a defect. For this purpose we suggest that special attention

* Appendix 5.

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FACTORS OF IRISH
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BRITISH MARKETS.

should be given to providing the necessary requirements for having the cream and butter properly cooled at the creamery, during the process of manufacture, and for cooling the butter after it is packed and before it is forwarded to the market. We also think that creamery proprietors should direct the manager of their creamery to determine carefully the percentage of water in the butter from each churning, and to see that the warranty, which, indeed, at present is almost invariably given, regarding the percentage of moisture in the butter, is prominently brought to the notice of the purchaser in the invoices or otherwise. We further consider that cooled railway vans provided for the cold transit of butter, and facilities for cold storage on steamships should be availed of as widely as possible. In this connection we may say that the cold storage which is provided on certain steamers between Ireland and Great Britain was stated in evidence to have a most beneficial influence on the keeping quality, texture, and general appearance of Irish butter consigned by this route.

Packages.

53. In the packing of Irish creamery butter, the same want of uniformity, to which we have already referred, is again noticeable. Irish creamery butter is now principally consigned in 56 lb. pyramid boxes, but 112 lb. kiels, 56 lb. kegs, and 28 lb. pyramid boxes are, to a considerable extent, used in forwarding creamery butter to the wholesale markets. Moreover, individual packages of the same kind are not always constructed according to the same specification. In this matter, however, a great improvement has taken place since the Department of Agriculture and Technical Instruction for Ireland held a conference in 1905 with Irish box-makers, at which a standard specification was drawn up for the 112 lb. kiel and for the 56 lb. pyramid box. Since that date, the Department have, through the medium of their creamery scheme and otherwise, constantly urged upon creamery proprietors the importance of using uniform packages, complying with the standard specification. We have had ample evidence that these efforts have met with a large share of success, but among those creamery proprietors who have not hitherto availed themselves of the facilities afforded by the Department for improving their business, inferior boxes are still in use. We inspected the packages in some stores in Great Britain, and we had an opportunity of comparing consignments from different countries. The Irish 56 lb. pyramid box, complying with the standard specification, appears to us to be well suited for the Irish trade, and we saw some consignments packed in these boxes which, in appearance, compared most favourably with any on the market. The question arises whether Ireland should adhere to the pyramid box, or adopt the kiel or the keg used by other countries. No doubt, as was pointed out by several witnesses, Irish butter would at present sell better in some markets—especially those in the east of Great Britain—if when turned out on the counter it displayed the shape of the cask rather than the shape of the pyramid box. It has also been urged that the pyramid box is associated with the sale of margarine, but this objection is met by the fact that margarine is also packed in kiels, kegs, and in every type of package used for butter. Taking all circumstances into account, we think that it would be in the interests of the Irish butter trade to adhere to the pyramid box as the distinctive package for Irish butter. This package has now become well established in the trade, and if, as we hope, Irish butter attains the foremost position in the British markets, it would be an advantage to have a characteristic package.

Before leaving the subject of packages, we may refer to the importance of attractive packing and finish. There was some complaint that boxes received from Ireland presented a soiled, not to say dirty, appearance, as compared with the white, clean packages from other countries, and it was strongly urged upon us to recommend that the practice of covering the boxes with canvas wrappers to protect them in transit should be adopted. The commercial value of care in packing and finish, although often overlooked, is very great, and the small extra trouble and cost will be more than repaid by the effect which the appearance of the package will have in promoting the sale of its contents. We, therefore, strongly advise manufacturers to take the greatest care in the packing of their butter.

Quality of
factory butter.

54. It will be observed that in discussing the flavour and texture of Irish butter, we have concerned ourselves mainly with the produce of creameries. It is only to be expected that an even greater irregularity should

be found in the case of factory and of dairy butter. Unless a good average standard of quality is maintained in the production of dairy butter, the standard of factory butter must obviously remain low. Therefore, efforts for the improvement of the latter class of butter must largely be directed to improving the quality of the butter made at the farmstead. We have in Part II. suggested that the Department of Agriculture and Technical Instruction for Ireland should extend their present educational schemes with a view to effecting this object. We fear, however, that in many cases owners of butter factories do not attach sufficient importance to the quality of the butter which they buy from farmers. The evidence, taken at Cork, and at our final sittings in Dublin, shows that there is not always sufficient monetary inducement given to farmers to improve the quality of butter intended for the blender, as the same price is sometimes paid for butters of quite unequal merits provided a comparatively low minimum standard of quality is reached. This state of affairs would seem to indicate that many owners of butter factories are satisfied to deal in butters of inferior quality. No doubt such butter may give the blender or the merchant just as high a profit as a first-class product, but it must be admitted that its existence involves a loss to the country as a whole, inasmuch as the low price secured for it in Great Britain, if it does not affect the profit of the merchant, must all the more reduce the return to the farmer and prejudice Irish butter generally in the markets of Great Britain. If the trade in factory butter is to be continued on a proper basis, we consider that factory owners should be prepared to encourage the production of the best class of dairy butter by paying for it at a scale proportionate to its merits. In the existing circumstances we see no possibility of Irish factory butter obtaining the prices which some of the butter made on the same system in Normandy at present commands. We cannot but think that the production of so large a proportion of inferior factory butter is a distinct loss to the country, and from this point of view, as well as in the interests of their own trade, we think that factory owners should consider whether it would not be advisable to give greater attention to the manufacture of a higher class of butter than that at present associated with the name "factory," as applied to Irish produce.

55. In concluding our observations with regard to the quality of Irish butter, we may refer to the fact that we have had evidence to show that the Reichert-Wollny number of pure Irish butter is sometimes much lower than the figure which the Departmental Committee on Butter Regulations,* appointed in 1901, recommended as the limit below which a presumption should be raised that the butter was not genuine. Since the Report of that Committee was presented to Parliament, experiments have been carried out in Ireland which show that at certain seasons of the year a large proportion of undoubtedly genuine butter is found by the Reichert-Wollny method to give a much lower figure than 24, the limit recommended by the Committee. In this connection we refer to the evidence of Mr. G. Brownlee, B.Sc., Assistant Agricultural Chemist of the Albert Agricultural College, Glasnevin, who has carried out a systematic series of experiments in this matter. We, therefore, consider that the Department of Agriculture and Technical Instruction for Ireland should communicate with the Local Authorities in Great Britain and offer to co-operate by inspection of the premises in any cases where Irish butter is suspected of adulteration owing to its low Reichert-Wollny figure.

Reichert-Wollny
figure

56. In the foregoing paragraphs we have dealt with the irregularity in the quality of Irish butter. We were equally struck with the irregularity in supply, due principally to the absence of winter dairying.

Irregularity in
supply.

In every aspect of our inquiry we found the stoppage in the production of butter in Ireland which takes place during the winter season most harmful. We have already drawn attention to the uses to which creameries have been put during the winter months in connection with the sale of colonial and foreign butters and the blending of butters, and we have referred to the detrimental results of such practices. Winter dairying would also promote the uniformity in quality which we have found to be so important a

* Departmental Committee to inquire into and report upon the desirability of Regulations under Section 4 of the Sale of Food and Drugs Act, 1899.—Final Report (Cd. 1742) 1903.

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Irish butter not
sold on the
merits.

requirement from the trade point of view. Finally, the need of winter dairying is again most clearly demonstrated by the effects to which we shall now refer of irregularity in supply upon the market prices of Irish butter.

57. The question may, naturally, be asked, how is it that the best Irish creamery butter fails to obtain the price given for Scandinavian butter, seeing that merchants have admitted that the best Irish butter is superior to the best Scandinavian, and that the expression so often occurs in the evidence that the butter is bought and sold "on its merits"? There is no doubt that, as a general rule, wholesale merchants are not satisfied to purchase butter solely on the reputation of the name, brand, grade mark, or other description applied to it. They insist upon an examination of the butter by themselves or their agent as the criterion of its commercial value. The expression to which we have referred is, however, only true in so far as it implies that the relative values of two lots of butter of the same country of origin, sold in the same market under the same conditions, are determined by the intrinsic merits of the butters as ascertained by the merchants who examine them. Other considerations than those concerned with the quality of the butter have undoubtedly a great influence upon market values.

The trouble involved in changing from Irish to another butter at the beginning of winter and of re-introducing Irish butter into the trade in the spring is so great that many merchants are inclined to confine their trade to the butters which come on the market in continuous supplies throughout the year. It is certain that Irish butter regains its place on the open market at a considerable loss to the manufacturers, who are obliged in the spring and early summer to accept prices below the intrinsic merits of the produce which they sell. Indeed, we understand that owing to the low prices at which Irish butter is offered in the foregoing circumstances, merchants are sometimes enabled to deal in it as their second line, while retaining throughout the year as their first line the butters which are available all the year round. Again, the difference in flavour and appearance between Irish butter and the Scandinavian and other butters which take its place during the winter months is most evident at the very time of the year when it first comes upon the markets. For instance, we are informed that its colour is most pronounced in the spring and early summer, and that it gradually grows paler as the season advances. Irish butter, therefore, when re-introduced, presents a very great contrast to the pale Scandinavian butters. The consumer objects to the sudden change from that to which he has been accustomed during the winter, with the result that Irish butter is seriously handicapped by its colour when it has to meet the other difficulties incidental to re-establishing itself on the markets. It may be pointed out that whilst it is possible to colour artificially a naturally pale butter, no satisfactory means have been devised for toning down a highly coloured butter, without injuring its quality. If, however, by winter dairying, a continuous supply of Irish butter is attained, the change in colour from the winter to the summer production, and vice versa, will be so gradual that no noticeable break in uniformity will occur.

Winter dairying.

58. When we asked merchants in Great Britain for their recommendations for the improvement of the industry they almost invariably suggested the establishment of winter dairying as the most important development required from their point of view. When we turn to the manufacturer or to the dairy farmer, we have to meet his question—will winter dairying pay? The answer depends altogether upon the average price which Irish butter will realise under a system of all-the-year-round dairying. We may point out that in regard to soil, climate, and facilities for marketing, Ireland, of all countries in the world, is pre-eminently fitted to supply to the British markets the highest quality of butter; that we are convinced that there are no uncontrollable circumstances which would prevent Irish butter from attaining in quality and quantity the first place in the British markets; and that if Irish butter gains this position its reputation should obtain for it an average price which will amply repay the manufacturer and the farmer for the extra expenses incurred in the production of butter throughout the year. On the other hand, without winter dairying, the Irish butter trade, in spite of all the natural advantages which it possesses, will continue to be depressed in the markets by its irregularity in supply, and can never hope to regain the foremost

position which it once held. Taking these circumstances into account, we think manufacturers in Ireland, and Irish dairy farmers, would be well advised to undertake the production of butter during the winter months. This would mean, in the first place, the careful selection of cows with a view to securing a high yield of butter per cow, for which purpose cow-testing associations on the lines already advocated by the Department of Agriculture and Technical Instruction for Ireland would be of the greatest usefulness. The Department have already given much attention to this subject. They have carried out, and are at present carrying out, experiments on a number of farms which show that butter can be produced profitably during the winter months. They are also guaranteeing a minimum price for milk of average quality to the milk suppliers of a selected creamery during the winter in order to determine whether such price can be paid by a creamery without incurring a loss, and whether the price is sufficient to induce farmers to adopt winter dairying. Such assistance is most valuable in encouraging the more enterprising farmers to undertake the changes in the treatment and management of their cattle which the introduction of the system involves. We think that Irish dairy farmers, generally, cannot fail to profit by the lessons these investigations teach, and that the result will be an extension of tillage for the production of winter food followed by an increase in the winter milk supply, leading gradually to the general adoption of winter dairying.

With the establishment of winter dairying the main cause of loss to the Irish butter industry from irregularity in supply will have been removed. The introduction of winter dairying, with the accompanying increase in tillage, should enable the dairy farmer to add to the number of his cows. In these circumstances we do not think that any great reduction in the amount of butter at present produced in summer would ensue. In addition to continuity of supply, winter dairying should therefore result in a considerable increase in Ireland's annual export of butter. We may point out that a very large increase in the present production of butter would be quite possible without any interference with other branches of farming.

59. Ireland is differentiated from other countries which supply the British markets by the frequent and rapid means of communication between the buyer in Great Britain and the manufacturer in Ireland. The butter manufacturer has many routes by which he can forward his produce, so that transit facilities are not only frequent, but also varied. We understand there are few parts of Ireland from which butter made to-day, if forwarded by parcels post or passenger train, would not reach the consignee in Great Britain to-morrow. It may also be pointed out that the postal and telegraphic regulations for the two countries are the same, and that communication by this means is so expeditious, easy and cheap as compared with foreign and colonial countries, as to give Ireland a great advantage in business transactions.

Marketing of
Irish butter.

As a result, Irish butter can be placed upon the British markets in the freshest condition, and therefore, whilst possessing the finest aroma and flavour—an asset to which we have already drawn attention when alluding to the flavour of Irish creamery butter. In order to avail themselves fully of these advantages, a number of manufacturers have adopted the practice of forwarding their butter direct to the retailer, or even to the consumer, and in many cases the net prices realised yield a high return to the maker. In reviewing the position of Irish butter in the markets it must, therefore, be borne in mind that a not inconsiderable quantity of the best Irish butter is sold at highly remunerative prices to retailers and consumers, that this trade is an increasing one, and that consequently the quotations for Irish butter in the wholesale trade as disclosed by trade journals do not give an accurate statement of the prices realised for Irish butter as a whole. It would materially assist to develop the trade in Irish butter direct from the producer to the consumer if the parcels post rates were amended so that the postage on parcels containing, say, 1 lb., 2 lb., and 3 lb. of butter respectively, would be calculated on the net weight of the butter, disregarding the weight of the package.

In the wholesale trade Irish butter is sold according to two well-recognised methods. In some cases butter is sent to the market "on consignment," which means that the consignee is at liberty to sell the butter for whatever price it will bring. A great proportion of Irish butter disposed of in the wholesale trade is, however, sold "at firm prices," i.e., the price is fixed by mutual

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agreement before the butter is consigned. The first mentioned arrangement often results in very poor returns to the manufacturer owing to butter being at times shipped "on consignment" to already overstocked markets. Even when butter is sold "at firm prices," the full value is not always obtained. Higher prices might, in many instances, be secured if the creamery managers in Ireland had more experience and knowledge of the markets, and read and interpreted properly the market quotations and the market reports in the trade journals and in trade circulars. For example, a creamery manager who feels somewhat uncertain as to the disposal of his butter will, at times, in his eagerness to secure a purchaser, owing to his want of knowledge of the conditions of the markets, accept a lower offer than the average current price. The result of this undercutting is not only to lower the price of his own produce, but also of that of other creameries. The great variation in prices realised by Irish creameries is shown by statistics* printed among the appendices to this Report.

The loss of reputation suffered by Irish butter owing to its irregularity in quality and supply, and to the sale of factory butter as creamery, has very seriously affected the market quotations for the best Irish butter. As we have pointed out, Irish butter is not sold on its merits. Merchants admittedly are enabled to obtain a greater margin of profit in the sale of Irish butter than in that of Scandinavian and other foreign and colonial butters. So much so that in order to secure for the best Irish butter its proper price it is sometimes necessary to sell it without any intimation of its origin, or even to have it packed in keels at the place of manufacture so that the customer may not infer that it is Irish. Instances of this kind show the great importance of the reputation attached to the name under which the butter is sold. For this reason we feel that the large quantity of factory and dairy butter of inferior quality which is sold as "Irish" has a very detrimental effect. As long as so much secondary butter of this kind is disposed of under the name of "Irish," we fear that the reputation of Irish butter, as a whole, must continue to suffer with resulting loss to its market value. The harm done by the consignment of inferior butter to the British markets is so clearly perceived in some other countries that we find special regulations prohibiting the export of butter which fails to attain a certain standard. The suggestion has not been made that such a regulation should be applied in Ireland, and indeed, for practical reasons, we do not think a suggestion of this kind would be feasible. It has, however, been urged upon us that it would be in the interests of the country if it could be made illegal for the term "Irish butter" to be applied to the very inferior classes of dairy and factory butter produced in Ireland at present and consigned to the markets and sold as "Irish butter." We are, indeed, convinced that if such a regulation were enforced, the industry as a whole would be much benefited. We only regret that the suggestion does not appear to be one which, in the existing circumstances, can be regarded as within the bounds of practicability. We can only hope that the trade in inferior butters from Ireland, which is, we are glad to say, a diminishing one, will, in the course of time, be entirely superseded.

Local
Associations.

60. To improve the position of Irish butter on the British markets as ascertained by our inquiry demands vigorous and united action by all those concerned with the welfare of the Irish butter industry. The Department of Agriculture and Technical Instruction for Ireland and existing agricultural associations can do much to promote the improvements suggested in this Part of our Report. We think, however, that something should be done to bring manufacturers themselves into closer contact with this work. It must be remembered that the enormous advances made within recent years in Scandinavian and other continental countries in the manufacture of butter have been largely due to combined action on the part of manufacturers in these countries, and not as so many persons believe, to direct action by the State. We think that at the present juncture there is a distinct need in Ireland for local associations consisting of representatives of co-operative and proprietary creameries, individually owned dairies, and of farmers and other local residents directly concerned in dairying and the production of butter; and, also of representatives of the County Committees of Agriculture. These associations would be similar to those which exist in continental countries for promoting

* Appendix 4.

the butter industry. The Department of Agriculture and Technical Instruction for Ireland in the working of their various county agricultural schemes have experienced the greatest benefit from the fact that these schemes are administered through local committees in each county. These committees, whose members are selected from local residents well acquainted with local conditions and requirements, are admirably qualified to administer the general agricultural schemes of the Department and to advise the Department in regard to the operations of these schemes. We do not think, however, that the County Committees of Agriculture would be the most suitable bodies for the purposes which we have now in view, in which the direct manufacture and marketing of a specific product is concerned. We have already indicated one proposal in which the assistance of local associations would be invaluable, viz., the issue to creamery proprietors of a Governmental Brand for butter. We think such associations might assist in promoting winter dairying, undertake the holding of local surprise butter competitions, supervise the work of the instructor in dairying for their district, organise cow-testing associations, encourage by special inducements improvement in the condition of the milk supply of the local dairy farmers either through milk-grading associations or otherwise, take joint action for the marketing of the produce, and advise the Department generally regarding the specific requirements of the dairying industry in their districts. These associations might, in some of their functions, be on a somewhat similar basis to that of the County Show Societies, and in reference to their special work would form a link between the action of the Department and that of the County Committees. We believe that no better means could be adopted for encouraging improvement in the industry generally than by the establishment of associations of this kind which would bring manufacturers together, and which would give them a share in the administration of schemes for the improvement of their particular industry. The close interest in the administration of these schemes which manufacturers would thus be induced to take, would, in our opinion, be a great incentive to their success.

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61. We have already emphasised incidentally throughout this Report the desirability of securing a high standard of technical and commercial qualifications among creamery managers, but so important is this subject that we think it right to devote a special paragraph to it. The position of the average Irish creamery manager at present carries with it neither remuneration nor conditions of tenure at all commensurate with the responsible duties which the holder should be competent to discharge. This would appear to be largely due to the absence of a proper appreciation on the part of creamery owners of the qualifications required for the position. Personal influence arising out of relationship, or friendship, is, in very many cases, the deciding element in the appointment of a creamery manager. An applicant who is in every way qualified, having successfully undergone in full the courses of training now available, has always before him the prospect of being passed over in favour of or superseded by an unqualified man supported by local influence. The fact that an unqualified man is ready to take the position at a lower salary is also used as an argument against any increase in the salary of the existing manager, however good may be his qualifications and experience. When creameries, as happens in some cases, are closed down during the winter months, the whole staff is sometimes discharged without any guarantee that they will be re-engaged in the following season. In other cases in which the creamery staff is not discharged their salaries are greatly reduced during the winter months. Again, the amount of the salary is often entirely inadequate. We are aware that in not a few instances 25s. per week, without any prospect of increments, is considered sufficient remuneration for the manager of a creamery which has a large output of butter. Furthermore, the creamery manager is usually left to find his own lodging as best he can. It is at present the exception to have a residence attached to a creamery. Not only is the manager not provided with housing accommodation, but in many cases, owing to the situation of the creamery, he finds it impossible to obtain for himself a suitable residence within a reasonable distance.

Qualifications and
position of the
Creamery Manager

We think that the idea that no special qualifications are necessary for the management of a creamery has done much to retard the

Improvement of Irish butter. Creamery proprietors should, in future, attach the greatest importance to the technical and commercial qualifications of their managers, so that in course of time, as happens in other countries, no applicant will be considered eligible unless possessed of recognised qualifications acquired by attendance at suitable courses of training in all subjects relating to creamery management. We also consider that it would be most desirable that a fully qualified manager, once appointed, should be subject to the satisfactory discharge of his duties and to good conduct, be assured of permanent employment. With the introduction of winter dairying, and even at present, we are of opinion that the services of the manager can be usefully and fully occupied during the whole of the year in connection with the ordinary work of the creamery, supplemented by attention to cow-testing associations amongst the milk suppliers, and other efforts to improve and increase the milk supply. In the matter of salaries, we consider that a scale of payment should be evolved on lines which would ensure that the minimum salary payable is adequate, and that suitable increments would be awarded in proportion to the growth of trade and the capability shown by the manager in conducting the business of the creamery. A system of this kind is already in vogue in other countries. The duties of a creamery manager during the summer months usually require him to be in attendance at a very early hour at the creamery, and the work requires constant attention and supervision very often until late in the evening. It is thus not only a distinct hardship that the manager is not provided with a suitable residence in close proximity to his work, but also involves a loss to the owners, as it is important that the manager should be at hand even outside the usual business hours, so that he can exercise constant supervision over such processes as the ripening of the cream. These suggestions, if carried out, would be to the advantage of creamery owners; and by raising the status of the creamery manager the position would be made one which would more generally attract and retain men of ability, with the greatest benefit to the industry.

SUMMARY.

SUMMARY OF PRINCIPAL CONCLUSIONS AND RECOMMENDATIONS.

62. The following is a summary of our principal conclusions and recommendations:—

1. That there are at present three well-recognised classes of Irish butter; that these are described by the terms "creamery butter," "dairy butter," and "factory butter," respectively; and, that these three terms constitute the three principal trade descriptions of Irish butter.

2. That the term "creamery butter," according to the custom of the trade, means unblended butter made from cream separated by centrifugal force from the commingled milk supplies of a number of cowkeepers, in premises adapted and utilised for the manufacture of butter in commercial quantities.

3. That the term "dairy butter," as understood in the trade, means butter made at the farmer's homestead, whether from whole milk, hand-skimmed cream, or cream extracted from the milk by means of a separator.

4. That the term "factory butter," as understood in the trade, means any butter blended, reworked, or subjected to any other treatment, but not so as to cease to be butter.

5. That butter made at the farmer's homestead, from cream extracted from the milk by means of a separator is properly described as "dairy separator butter."

SCHEDULE.

6. That steps should be taken to prevent the use for dairy butter and for factory butter of names which are suggestive of the term "creamery."

7. That the Department of Agriculture and Technical Instruction for Ireland should take special steps by bringing our findings, as set forth in Part I., before all those engaged in the industry, to secure the co-operation of the principal trade associations and other bodies, as well as of individual members of the trade, in stamping out the abuses which have arisen from the application of misleading or ambiguous names to Irish butter.

8. That the practice of some creamery proprietors, in regard to the sale from creameries of foreign and colonial butter and of blended butter during the winter months involves infringements of the law and causes confusion in the classification of Irish butter with resulting injury to the industry.

9. That in order to prevent reworking of butter in creameries, the Department of Agriculture and Technical Instruction for Ireland should exercise their powers under Section 2 (3) of the Butter and Margarine Act, 1907.

10. That the Department of Agriculture and Technical Instruction for Ireland should be empowered to make regulations embodying the following conditions, to which all makers of Irish creamery butter should be legally obliged to conform:—

1. No premises shall be used for the production of creamery butter in Ireland unless and until they are registered as a creamery with the Department by the person bona fide carrying on the business;
2. No premises shall be registered as a creamery by the Department unless and until the Department are satisfied that the butter produced in the premises is creamery butter;
3. No premises shall be registered as a creamery which require to be registered under the Sale of Food and Drugs Acts, 1875 to 1907;
4. Premises registered as a creamery shall be open at all reasonable times to inspection by the Officers of the Department, with the object of enabling the Department to satisfy themselves that the premises are not utilised for any purposes prohibited by law;
5. The trade description "creamery" shall not be applied to any butter consigned from any premises used for the production of butter in Ireland unless and until such premises have been registered as a creamery by the Department;
6. No butter shall be consigned from a creamery in any package or wrapper which is not marked (in such manner as the Department may approve) with the words "Irish Creamery Butter", and with a special registered mark or number to be allotted by the Department, which number or mark shall vary with each creamery.

N.B.—The registration and inspection above referred to shall in no way compel any creamery proprietors to conform to any of the Department's schemes for encouraging improvement in the management of creameries; the participation in such schemes to be purely voluntary.

11. That a satisfactory standard of cleanliness in the milk supply of creameries can best be attained by a general agreement among creamery proprietors to refuse unsuitable milk.

SUMMARY.

12. That the Department of Agriculture and Technical Instruction for Ireland should seek powers to regulate, so far as may be necessary in the general interests of the industry, the conditions under which butter, or milk for the manufacture of cream of butter, is produced.

13. That the Department of Agriculture and Technical Instruction for Ireland should formulate and arrange in conjunction with local associations a scheme for the establishment of a special Governmental Brand for Irish creamery butter.

14. That the committees of co-operative creameries in Ireland should in every way acquire a closer acquaintance with the actual working of their creameries and the sale of their produce.

15. That the courses of instruction for creamery managers in technical and commercial subjects, provided by the Department of Agriculture and Technical Instruction for Ireland at selected centres, have served a useful purpose; and, that the Department, in considering the various means by which they can promote the Irish butter industry, should attach the greatest importance to the technical and commercial training of those who may be entrusted with the management of Irish creameries.

16. That through the operation of the scheme of the Department of Agriculture and Technical Instruction for Ireland for the improvement of home butter-making, instruction should be given in the production of dairy butter, with resulting advantages to the proprietors of butter factories.

17. That it would appear that some owners of butter factories do not attach sufficient importance to the quality of butter which they buy from the farmers; and, that unless owners of butter factories are prepared to encourage the production of the best class of dairy butter by paying for it at a scale proportionate to its merits, we see no possibility of Irish factory butter obtaining prices which some of the butter made on the same system in Normandy at present commands.

18. That in the course of our inquiry, evidence has been given indicating that the Reichert-Wollny number of pure Irish butter is sometimes much lower than the figure which the Departmental Committee on Butter Regulations, appointed in 1901, recommended as the limit below which the presumption should be raised that the butter was not genuine; and, that the Department of Agriculture and Technical Instruction for Ireland should communicate with Local Authorities in Great Britain and offer to co-operate by inspection of the premises in any cases where Irish butter is suspected.

19. That the stoppage in the production of butter in Ireland during the winter season, due to the absence of winter dairying, is most harmful to the Irish butter industry; and, that having regard to the special circumstances of Ireland, we are convinced that Irish dairy farmers would be well advised to undertake the production of milk required for the manufacture of butter during the winter months.

20. That it would materially assist to develop the trade in Irish butter direct from the producer to the consumer if parcels post rates were amended so that parcels containing, say, 1 lb., 2 lbs., and 3 lbs. of butter could be sent for the postage now charged for 1-lb., 2-lb., and 3-lb. parcels respectively.

21. That as a means of supplementing the efforts of the Department of Agriculture and Technical Instruction for Ireland, and of existing associations, it would be desirable that local associations should be formed in Ireland for promoting the interests of the Irish butter industry; that local associations in Holland, Denmark, and Sweden at present administer to a large extent schemes similar to those which the Department in Ireland have been obliged

not only to initiate, but to administer with little or no assistance; and that properly constituted local associations in Ireland, acting in conjunction with the Department, on a somewhat similar basis to that of the County Show Societies, would be a most effective means of promoting improvement in the Irish butter industry. SECRETARY.

22. That in appointing creamery managers the owners of creameries should attach the greatest importance to technical and commercial qualifications, and that the position of creamery managers should be such as would more generally attract and retain men of ability.

We desire to place on record an acknowledgment of the part taken by Mr. D. J. McGrath in carrying out the instruction contained in your Minute of 23rd April, 1909. His complete grasp of the requirements of the investigation and his intimate acquaintance with the detail of the information brought before your Committee have been invaluable. We are of opinion that his work in connection with the arrangement of the inquiry and the drafting of this Report has been of great service to the Department.

We have the honour to be,

Sirs,

Your obedient servants,

J. R. CAMPBELL, *Chairman.*

THOMAS CARROLL,

E. G. HAYGARTH BROWN,

CARRICK,

A POOLE WILSON,

DENIS J. McGRATH, *Secretary.*

Dublin. Dated this Eleventh day of March, 1910.

DUBLIN CASTLE,

14th March, 1910.

SIR,

I am directed by the Lord Lieutenant to acknowledge the receipt of your letter of this date forwarding, for submission to His Excellency, the Report of the Departmental Committee on the Irish Butter Industry, and the Minutes of Evidence taken by the Committee with the Appendices thereto.

I am, Sir,

Your obedient Servant,

J. B. DOUGHERTY.

THE SECRETARY,

DEPARTMENT OF AGRICULTURE, &c.